



# HONG KONG Q-MARK FOOD CERTIFICATION SCHEME

## Technical Regulations on SAUCE (HKQM-FD-SA)

Hong Kong Q-Mark Council  
Jan 2021



**Published by Hong Kong Q-Mark Council**  
under the auspices of the Federation Of Hong Kong Industries

31/F, Billion Plaza, 8 Cheung Yue Street,  
Cheung Sha Wan, Kowloon, Hong Kong.

9<sup>th</sup> Edition : Jan 2021

## Table of Content

1. Introduction
  2. Technical Definitions
  3. Quality System
  4. Requirements of Products
  5. Product & On-site Evaluation
    - 5.1 Product Type
      1. Product Definition
      2. Product Identification
      3. Applicable Testing Standards
    - 5.2 Factory Evaluation
      1. Production Procedures
      2. Production Equipment
      3. Test Facilities
      4. Factory Inspection and Routine Test
      5. Equipment Calibration
      6. Equipment Verification
    - 5.3 Plant Management
      1. Personnel
      2. Education and Training
      3. Supervision
    - 5.4 Process Control (General)
    - 5.5 Process Control (Sanitation)
    - 5.6 Building and Facilities
  6. Quality Control
  7. Product Scope Extension or Reduction
  8. Marking and Labelling
  9. Quality Records
- 
- Annex I List of the food product
- Annex II Test plan for Certification, Recertification, Surveillance Assessment and Open Market Testing
- Annex III Additional Quality Control Test Item

# Technical Regulations

## 1. Introduction

1.1 The Technical Regulations set out the technical requirements of the Scheme.

1.2 The Technical Regulations shall be read in conjunction with the Administrative Regulations and the relevant Hong Kong Q-Mark Regulations (including HKQ-01 and HKQ-02).

## 2. Technical Definitions

2.1 "Adequate" means that which is needed to accomplish the intended purpose in keeping with good public health practice.

2.2 "Plant" means the building or buildings or parts thereof, used for or in connection with the manufacturing, processing, packaging, labeling, or holding of human food.

2.3 "Sanitize" means adequate treatment of surfaces by a process that is effective in destroying vegetative cells of pathogenic bacteria and in substantially reducing other micro-organisms. Such treatment shall not adversely affect the product and shall be safe for the consumer.

2.4 "Food Product" represents the foodstuff of Sauce and the corresponding flavor of the foodstuff, abbreviated as "product".

2.5 "Same production line" means the production process that involves same manufacturing process of food content.

2.6 "Same series of food product" means the production of those food products are carried out in the same production line; with the same major ingredient.

## 3. Quality System

3.1 An effective quality system shall be established, documented and maintained in accordance with the prevailing ISO 9001 or ISO 22000 requirements to ensure and demonstrate that the food products produced and supplied under the Scheme conforms to the relevant requirements and the Regulations.

3.2 The licensee shall control, but not limited to, following documents which are made available in production floor to provide instructions

1. Defining the manner, including sequence, step or method, of manufacturing processes of products for workers to comply with;
2. Defining process control method for workers to comply with 5.4 & 5.5;
3. Defining in-process and final inspection and testing activities for inspectors and/or workers to comply with 5.2.4.

Document control includes review and approval of issue and change, revision level, availability of updated revision in location of use and removal of outdated copy from point of use.

#### 4. Requirements of Products

4.1 The licensed products shall comply with the specific items of Microbiological Guidelines for Food (August 2014 (Revised)).

4.2 The licensed product shall be manufactured in accordance to this Scheme and at the premise which has been approved for this purpose.

4.3 The licensed product shall comply with Hong Kong Food Legislation and regulations.

#### 5. Product & On-site Evaluation

##### 5.1 Product Type

###### 5.1.1 Product Definition

Sauce can be defined as:

1. Ready-to-eat condiment made from heat treated or other acceptable process.
2. Additional to food for enhancement of taste.
3. The food product included under the scope of this scheme can be found at Annex I.

###### 5.1.2 Product Identification

The licensee shall identify product for both identification and its production status throughout factory facility. As traceability is a specified requirement, individual product or batch (lot) shall be uniquely identified, which means shall be recorded (see "Clause 9").

###### 5.1.3 Applicable Testing Standards

The following test items should be done within the audit programm and test plan shall be established by the audit team as refer to Annex II. Before the acceptance of the application, the Applicant's product details shall be checked with relevant HOKLAS or its MRA partners accredited laboratory to confirm related HOKLAS or its MRA partners endorsed test report can be produced.

TEST	TEST LIMIT
Preservative (sorbic acid), ppm	Less than or equal to 1000
Preservative (benzoic acid), ppm	Less than or equal to 1000
Colouring Matters <sup>d</sup> <ul style="list-style-type: none"><li>● Sudan I/II/III/IV</li><li>● Sudan Red 7B</li></ul>	Not detected

<ul style="list-style-type: none"> <li>● Sudan Orange G</li> <li>● Dimethyl Yellow</li> </ul>		
Heavy metal contaminations <sup>e</sup> , mg/Kg	Antimony	Less than or equal to 1
	Arsenic (inorganic)	Less than or equal to 1.4 <sup>a</sup>
	Cadmium	Less than or equal to 0.1 <sup>b</sup>
	Chromium	Less than or equal to 1
	Lead	Less than or equal to 6
	Mercury (total)	Less than or equal to 0.5
	Tin	Less than or equal to 230
Microbiological limits	Coliform	Less than 20 cfu/g
	E. Coli count	Less than 20 cfu/g
	Mould & Yeast	Less than 1,000 cfu/g
	Salmonellae	Negative/ 25g
	Staphylococcus aureus	Less than 20 cfu/g
	Total plate count	Less than 100,000 cfu/g <sup>c</sup>
Melamine, mg/kg		Less than or equal to 2.5

Remark:

- a. Less than or equal to 10 for naturally present in specified foods such as shellfish products.
- b. Less than or equal to 2 for fish, crab-meat, oysters, prawns and shrimps products.
- c. Test limit subject to final verification with table 1.2 of Microbiological Guidelines for Food (August 2014 (Revised)) and document in the test plan.
- d. Appropriate colouring test item(s) shall base on ingredients, and then determine and document in the test plan.
- e. General test items / limits only. Appropriate test item(s) / limit(s) shall base on ingredients, and then determine and document in the test plan.

The following test items should be done for the plastic container in the initial certification and re-certification:

TEST		SPECIFICATION	
Migration test for food contacting plastic surfaces (EU Regulation (EU) No. 10/2011)	General food contact	10 mg/dm <sup>2</sup>	As set out in Annex to Regulation (EU) 10/2011, or 60 mg/kg if it is not specified for certain substance
	Food contact intended for infants and young children	60 mg/kg	

If the test limit of all the above test(s) is in doubt, the Council would refer to respective regulations latest version as the final reference.

## 5.2 Factory Evaluation

### 5.2.1 Production Procedures

Requirement about the production procedure can be found below:

1. Prior to release for production, raw materials shall be inspected as defined to assure the conformance to specified requirements (see also “clause 5.5.1 and 5.5.2”).
2. Urgently needed raw materials can be released if positive identification is made to permit necessary recall when the test result is found to be unsatisfactory. However, prior to release of final products for delivery to customer, all planned inspection and testing shall have completed with satisfactory result.
3. The production is proceeded in accordance to specified flow stipulated in company standards
4. The quality control procedures are proceeded in accordance to specified flow stipulated and documented in company standards (see “clause 5.2.4”)
5. Any change to manufacturing flow shall have approval from authorized staff, which shall keep informed of the Council in writing.
6. The licensee shall prepare adequate work instructions (see 3.2) to define the manner of production and operation of production machines/equipment and make them available on production line so that workers know how to perform their daily jobs.
7. Final products are to be manufactured to meet the standard as specified in 5.1.3 of the Scheme and in-house specification.

### 5.2.2 Production Equipment

All plant equipment and utensils shall be:

1. Suitable for their intended use;
2. So designed and of such raw material and workmanship as to be adequately cleanable; and
3. Properly maintained.

The design, construction, and use of such equipment and utensils shall preclude the adulteration of food with lubricants, fuel, metal fragments, contaminated water, or any other contaminants. All equipment shall be so installed and maintained as to facilities the cleaning of the equipment and of all adjacent spaces. Maintenance record for any preventive and/or breakdown maintenance shall be maintained (see “Clause 9”).

### 5.2.3 Test Facilities

The licensee shall identify, establish, operate, and maintain adequate test facilities in the production premises. In addition, tests done by external laboratory may be needed in order to ensure raw material, semi-finished, or final product can meet specified requirements.

### 5.2.4 Factory Inspection and Routine Test

Inspection and routine test shall be performed according to the corresponding measures and acceptance criteria specified and documented by the company standards.

Inspection and test records (see "Clause 9") shall be maintained to demonstrate conformance to specified requirements. Inspection and test status, and nonconforming product status shall be properly identified throughout production line.

The licensee shall implement appropriate action, which are justified by designated staff, to prevent recurrence of product non-conformances.

### 5.2.5 Equipment Calibration

The licensee shall identify and justify equipment used for inspecting, measuring and testing final product non-conformance to be put under appropriate calibration control.

Those equipment, especially for balance and standard weights, shall be calibrated and adjusted at defined intervals. Calibration status and records shall be maintained (see "Clause 9"), which should contain following data:

- Date of calibration or repair;
- Method of calibration with detailed procedure or reference to procedure;
- Acceptance criteria;
- Result of calibration with detailed data.

Calibration shall be conducted against certified equipment, which can be designated as in-house calibration master. This master must be calibrated by external body which can demonstrate calibration traceability to nationally or internationally recognized standard. Where no such standard exists, the basis for calibration shall be documented.

### 5.2.6 Equipment Verification

Where test software or comparative references such as test hardware are used as suitable form of inspection, they shall be checked to prove that they are capable of verifying the acceptability of final product, prior to release for use during production, and shall be rechecked at prescribed intervals. The

licensee shall establish the extent and frequency of such checks and shall maintain records as evidence of control (see "Clause 9").

### 5.3 Plant Management

The plant management shall take all reasonable measures and precautions to assure the following:

#### 5.3.1 Personnel

##### 1. Disease Control

No person affected by disease in a communicable form, or while a carrier of such disease, or while affected with boils, sores, infected wound, or other abnormal sources of microbiological contamination, shall work in a food plant in any capacity in which there is a reasonable possibility of food or food ingredients becoming contaminated by such person, or of disease being transmitted by such person to other individuals.

##### 2. Cleanliness

All persons, while working in direct contact with food preparation, food ingredients, or surfaces coming into contact therewith shall:-

- a. Wear clean outer garments, maintain a high degree of personal cleanliness, and conform to hygienic practices while on duty, to the extent necessary to prevent contamination of food products.
- b. Wash their hands thoroughly (and sanitize if necessary to prevent contamination by undesirable microorganism) in an adequate hand-washing facility before starting work, after each absence from the work station and at any other time when the hands may have become soiled or contaminated.
- c. Remove all insecure jewelry and during periods where food is manipulated by hand, remove from hands any jewelry that cannot be adequately sanitized.
- d. If gloves are used in food handling, they should be maintained in an intact, clean, and sanitary condition. Such gloves should be of an impermeable material except where their usage would be inappropriate or incompatible with the work involved.
- e. Wear hair nets, headbands, caps, or other effective hair restraints.
- f. Do not store clothing or other personal belongings, eat food or drink beverages, or use tobacco in any form in areas where food or food ingredients are exposed or in areas used for washing equipment or utensils.
- g. Take any other necessary precautions to prevent contamination of foods with microorganisms or foreign substances including, but not limited to, perspiration, hair, cosmetics, tobacco, chemicals, and medicine.

### 5.3.2 Education and Training

Personnel responsible for identifying sanitation failures or food contamination should have a background of education or experience, or a combination thereof, to provide a level of competency necessary for production of clean and safe food. Food handlers and supervisors should receive appropriate training in proper food-handling techniques and food-protection principles and should be cognizant of the danger of poor personal hygiene and insanitary practices. Training records shall be maintained (see "Clause 9").

### 5.3.3 Supervision

Responsibility for assuring compliance by all personnel with all requirements of this document shall be clearly assigned to competent supervisory personnel.

## 5.4 Process Control (General)

5.4.1 The licensee shall establish and maintain documented procedures which are known to be capable of producing final products that meet the specified requirements. Specifically, the control items, control method, quality characteristics, and testing method shall be established and documented for following appropriate control mechanism:

- a. Initial process approval (pre-setting) before mass production;
- b. Monitoring and control of identified critical process parameters and/or product characteristics;
- c. Compliance with code of practices (see 5.3, 5.5 & 5.6), regulatory or statutory requirements.

Records of implementation of either control mechanism "a" or "b" shall be maintained (see "Clause 9").

5.4.2 Production staff shall follow the defined, authorized and documented procedures for each stage of production process.

5.4.3 Any deviation from defined procedures must be reported (see "Clause 9") and approved. The approval shall be granted by authorized persons from production and/or quality control.

5.4.4 Before the start of production, steps shall be taken to ensure that the work area and the environmental conditions are suitable. Equipment used for monitoring environment shall be calibrated in accordance to 5.2.5.

5.4.5 Defects and irregularities are reported (see "Clause 9") and appropriate corrective and preventive actions are taken and recorded (see "Clause 9") to avoid their reoccurrence and occurrence.

## 5.5 Process Control (Sanitation)

All operations in the receiving, inspecting, transporting, packaging, segregating, preparing, processing, and storing of food shall be conducted in accordance with adequate sanitation principles. Overall sanitation of the plant shall be under the supervision of an individual assigned responsibility for this function. All reasonable precautions, including the following, shall be taken to assure that production procedures do not contribute contamination such as filth, harmful chemicals, undesirable micro-organisms, or any other objectionable material to the processed product:

5.5.1 Raw material and ingredients shall be inspected and segregated as necessary to assure that they are clean, wholesome, and fit for processing into human food and shall be stored under conditions that shall protect against contamination and minimize deterioration. Raw materials shall be washed or cleaned as required to remove soil or other contamination.

Water used for washing, rinsing, or conveying of food products shall be of adequate quality, and water shall not be reused for washing, rinsing, or conveying products in a manner that may result in contamination of food products.

5.5.2 Containers and carriers of raw ingredients shall be inspected on receipt to assure that their condition has not contributed to the contamination or deterioration of the products.

5.5.3 When ice is used in contact with food products, it shall be made from potable water and shall be used only if it has been manufactured in accordance with adequate standards and stored, transported, and handled in a sanitary manner.

5.5.4 Food-processing areas and equipment used for processing human food should not be used to process nonhuman food-grade animal feed or inedible products unless there is no reasonable possibility for the contamination of the human food.

5.5.5 Processing equipment shall be maintained in a sanitary condition through frequent cleaning including sanitization where indicated. In so far as necessary, equipment shall be taken apart for thorough cleaning.

5.5.6 All food processing, including packaging and storage, shall be conducted under such conditions and controls as are necessary to minimize the potential for undesirable bacterial or other microbiological growth, toxin formation, or deterioration or contamination of the processed product or ingredients. This may require careful monitoring of such physical factors as time, temperature, humidity, pressure, flow-rate and such processing operations as freezing, dehydration, heat processing, and refrigeration to assure that mechanical breakdowns, time delays, temperature fluctuations, and other factors do not contribute to the processed products. Monitoring records of above factors shall be maintained (see "Clause 9").

5.5.7 Chemical, microbiological, or extraneous-material testing procedures shall be utilized where necessary to identify sanitation failures or food contamination, and all foods and ingredients that have

become contaminated shall be rejected or treated or processed to eliminate the contamination where this may be properly accomplished.

5.5.8 Packaging processes and materials shall not transmit contaminants or objectionable substances to the products, and shall conform to any applicable public health regulation, and shall provide adequate protection from contamination.

5.5.9 Meaningful coding of products sold or otherwise distributed from a manufacturing, processing, packing, or repacking activity shall be utilized to enable positive lot identification to facilitate, where necessary, the segregation of specific food lots that may have become contaminated or otherwise unfit for their intended use. Records shall be retained for a period or time that exceeds the shelf life of the final product (see "Clause 9").

5.5.10 Storage and transportation of final products shall be under such conditions as shall prevent contamination, including development of pathogenic or toxigenic microorganisms, and shall protect against undesirable deterioration of the product and the container.

## **5.6 Building and Facilities**

### **5.6.1 Plants and Grounds**

5.6.1.1 *Grounds.* The grounds about a food plant under the control of the operator shall be free from conditions which may result in the contamination of food including but not limited to the following:

- a. Improperly stored equipment, litter, waste, refuse, and uncut weeds or grass within the immediate vicinity of the plant buildings or structures that may constitute an attractant, breeding place, or harbourage for rodents, insects, and other pests.
- b. Excessively dusty roads, yards, or parking lots that may constitute a source of contamination in areas where food is exposed.
- c. Inadequately drained areas that may contribute contamination to food products through seepage or foot-borne filth and by providing a breeding place for insects or micro-organisms.
- d. If the plant ground is bordered by grounds not under the operations control of the kind described in above paragraphs (a) through (c) of this section, care must be exercised in the plant by inspection, extermination, or other means to effect exclusion of pests, dirt, and other filth that may be a source of food contamination.

5.6.1.2 *Plant construction and design.* Plant buildings and structures shall be suitable in size, construction, and design to facilitate maintenance and sanitary operations for food-processing purposes. The plant and facilities shall:

- a. Provide sufficient space for such placement of equipment and storage of materials as is necessary for sanitary operations and production of safe food. Floors, walls, and

ceilings in the plant shall be of such construction as to be adequately cleanable and shall be kept clean and in good repair. Fixtures, ducts, and pipes shall not be so suspended over working areas that drip or condensate may contaminate foods, raw materials, or food contacting surfaces. Aisles or working spaces between equipment and between equipment and walls shall be unobstructed and of sufficient width to permit employees to perform their duties without contamination of food or food-contact surfaces with clothing or personal contact.

b. Provide separation by partition, location, or other effective means for those operations which may cause contamination of food products with undesirable microorganisms, chemicals, filth, or other extraneous materials.

c. Provide adequate lighting to hand-washing areas, dressing and locker rooms, and toilet rooms and to all areas where food or food ingredients are examined, processed, or stored and where equipment and utensils are cleaned. Light bulbs, fixtures, skylights, or other glass suspended over exposed food in any step of preparation shall be of the safety type or otherwise protected to prevent food contamination in case of breakage.

d. Provide adequate ventilation or control equipment to minimize odours and noxious fumes or vapours (including steam) in areas where they may contaminate food. Such ventilation or control equipment shall not create conditions that may contribute to food contamination by airborne contaminants.

e. Provide, where necessary, effective screening or other protection against birds, animals, and vermin (including, but not limited to, insects and rodents).

#### 5.6.2 Sanitary Facilities and Controls

Each plant shall be equipped with adequate sanitary facilities and accommodations including, but not limited to, the following:

a. *Water supply.* The water supply shall be sufficient for the operations intended and shall be derived from an adequate source. Any water that contacts foods or food-contact surfaces shall be safe and of adequate sanitary quality. Running water at a suitable temperature and under pressure as needed shall be provided in all areas where the processing of food, the cleaning of equipment, utensils, or containers, or employee sanitary facilities required.

b. *Sewage disposal.* Sewage disposal shall be made into an adequate sewerage system or disposed of through other adequate means.

c. *Plumbing.* Plumbing shall be of adequate size and design and adequately installed and maintained to :

- Carry sufficient quantities of water to required locations throughout the plant.
- Properly convey sewage and liquid disposable waste from the plant.

- Not constitute a source of contamination to foods, food products or ingredients, water supplies, equipment, or utensils or create an insanitary condition.

- Provide adequate floor drainage in all areas where floors are subject to flooding-type cleaning or where normal operations release or discharge water or other liquid waste on the floor.

d. *Toilet facilities.* Each plant shall provide its employees with adequate toilet and associated hand-washing facilities within the plant. Toilet rooms shall be furnished with toilet tissue. The facilities shall be maintained in a sanitary condition and kept in good repair at all times. Doors to toilet rooms shall be self-closing and shall not open directly into areas where food is exposed to airborne contamination, except where alternate means have been taken to prevent such contamination (such as double doors, positive air-flow systems, etc.). Signs shall be posted directing employees to wash their hands with cleaning soap or detergents after using toilet.

e. *Hand-washing facilities.* Adequate and convenient facilities for hand washing and, where appropriate, hand sanitizing shall be provided at each location in the plant where good sanitary practices require employees to wash or sanitize and dry their hands. Such facilities shall be furnished with running water at a suitable temperature for hand washing, effective hand-cleaning and sanitizing preparations, sanitary towel service or suitable drying devices, and, where appropriate, easily cleanable waste receptacles.

f. *Rubbish and offal disposal.* Rubbish and any offal shall be so conveyed, stored, and disposed of as to minimize the development of odour, prevent waste from becoming an attractant and harbourage or breeding place for vermin, and prevent contamination of food, food-contact surfaces, ground surfaces, and water supplies.

### 5.6.3 Sanitary Operations

a. *General maintenance.* Buildings, fixtures, and other physical facilities of the plant shall be kept in good repair and shall be maintained in a sanitary condition. Cleaning operations shall be conducted in such a manner as to minimize the danger of contamination of food and food-contact surfaces. Detergents, sanitizer, and other supplies employed in cleaning and sanitizing procedures shall be free of significant microbiological contamination and shall be safe and effective for their intended uses. Only such toxic materials as are required to maintain sanitary conditions, for use in laboratory testing procedures, for plant and equipment maintenance and operation, or in manufacturing or processing operations shall be used or stored in the plant. These materials shall be identified and used only in such manner and under conditions as shall be safe for their intended uses.

b. *Animal and vermin control.* No animals or birds, other than those essential as raw material, shall be allowed in any area of a food plant. Effective measures shall be taken to exclude pests from the processing areas and to protect against the contamination of foods in or on the premises by animals, birds, and vermin (including, but not limited to rodents and insects). The use of insecticides or rodenticide is permitted only under such precautions and restrictions as shall prevent the contamination of food or packaging materials with illegal residues.

c. *Sanitation of equipment and utensils.* All utensils and product contacting surfaces of equipment shall be cleaned as frequently as necessary to prevent contamination of food and food products. Non-product contacting surfaces of equipment used in the operation of food plants shall be cleaned as frequently as necessary to minimize accumulation of dust, dirt, food particles, and other debris. Single-service articles (such as utensils intended for one-time use, paper cups, paper towels, etc.) shall be stored in appropriate containers and handled, dispensed, used, and disposed of in a manner that prevents contamination of food or food-contact surfaces. Where necessary to prevent the introduction of undesirable microbiological organisms into food products, all utensils and product-contact surfaces of equipment used in the plant shall be cleaned and sanitized prior to such use and following any interruption during which such utensils and contact surfaces may have become contaminated. Where such equipment and utensils are used in a continuous production operation, the contact surfaces of such equipment and utensils shall be cleaned and sanitized on a predetermined schedule using adequate methods for cleaning and sanitizing. Sanitizing agents shall be effective and safe under conditions of use. Any facility, procedure, machine, or device may be acceptable for cleaning and sanitizing equipment and utensils if it is established that such facility, procedure, machine, or device shall routinely render equipment and utensils clean and provide adequate sanitizing treatment.

d. *Storage and handling of cleaned portable equipment and utensils.* Cleaned and sanitized with product-contact surfaces shall be stored in such a location and manner that product-contact surfaces are protected from splash, dust, and other contamination.

## 6. Quality Control

Any change in raw materials, manufacturing procedures or control plan that can affect the properties of the food products shall be recorded.

The control procedures shall consist of a system for the production quality control to ensure that the product complies with the relevant requirements.

The production control shall consist of the following main phases:

1. inspection and/or testing of raw materials;
2. inspection and/or testing of production equipment and process;
3. inspection and/or testing on finished products.

### 6.1 Production

#### 6.1.1 Raw materials

The Licensee shall define the acceptance criteria and control procedures for incoming materials to ensure that these are not used until it has been verified that they comply with the required specifications of this Scheme. For the purposes of additional quality control, sample tests to those raw materials given in **Annex III** for shall also be used.

### 6.1.2 Production process

The Licensee shall identify and define the plant and production processes and ensure that the processes are carried out under controlled conditions clearly described in the procedures. The processes are verified by means of inspections and tests documented in a plan, as frequency and values or criteria are required both on equipment and on operations in the process. The actions to be taken when control values or criteria are not obtained shall be given.

### 6.2 Finished products

The number and size of the samples, the frequency of sampling, the tests performed and the results obtained shall be recorded. For the purposes of additional quality control, sample tests to those finished products given in **Annex III** shall also be used.

### 6.3 Statistical techniques

Where and when possible and applicable, the results of inspections and testing shall be interpreted by means of statistical techniques, by attributes or by variables, to verify the product characteristics and to determine if the production complies with the compliance criteria and the product complies with the declared values.

### 6.4 Registration and traceability

The Licensee shall establish and maintain suitable procedures for the identification and traceability of materials from receipts of raw materials and during all stages of production and delivery.

Traceability of the food products based on an electronic means using either radio frequency identification (RFID) or two dimensional bar code systems or similar equivalent should be adopted. The use of this system provides a control mechanism of the authenticity of the food products throughout the supply chain from the factory to the purchaser.

## 7. Product Scope Extension or Reduction

7.1 When an existing licensee wants to apply for the Scheme on a product, which is similar to her existing certified product, she can apply for an extension of scope instead of a new application.

7.2 Conditions for entitlement of the extension or reduction of scope include the following indicated criteria:

- a. The applicant is an existing licensee;
- b. Product under application falls in the same product category which the applicant has been certified;
- c. The product is manufactured by process is provided by system which is similar to that for the existing certified product; and

d. The product is manufactured at the same location as that of the existing certified product.

7.3 The applicant (licensee) shall complete the appropriate Extension or Reduction of scope Form(s). Upon receipt of the application, the Technical Team shall review the case and determine if there is a need to perform product testing, factory / company assessment, both of the aforementioned, or none of the aforementioned. The Council shall review and approve along with the extension or reduction of scopes. Final approval or rejection by the Council shall be reported to the appropriate licensee with reasons specified.

## **8. Marking and Labelling**

Each pack of product manufactured under the license shall be legibly marked either on the product or packaging with the following information:

- a. The name and address of the manufacturer, packer, distributor, importer, exporter or vendor of the product shall be declared;
- b. Name of the product, brand name, or model number;
- c. Date of manufacture, date of best consumption, or lot number which may be in code;
- d. Net content;
- e. List of ingredients shall be declared on the label in descending order of proportion.
- f. Nutritional Label of the product, which shall comply with the statutory regulation of the sales location. Applicant shall provide supporting documents for Nutritional Label test report, which can be arranged either by the Applicant or the Council. The Applicant shall pay all fees corresponding to the above testing.
- g. Storage method

## **9. Quality Records**

The licensee shall maintain up-to-date records to demonstrate the achievement of the required quality. The records should also be used to promote quality control method. Besides those quality records identified in above requirements, the licensee shall identify other quality records by their own.

All records shall be legible and identifiable to the product or process involved. They shall be readily retrievable and is available for inspection by the representative of Council. The licensee shall define and document retention time of quality records, the retention period should not be less than the shelf life of the products and with a minimum period of six months, and / or according to the regulatory requirement.

Annex I

List of Food Product:

	Food Product
1	oyster sauce
2	Soy sauce
3	Chili Sauce
4	Satay Sauce
5	Hoisin sauce
6	Plum sauce
7	Ginger Sauce
8	Sa Cha Sauce
9	Bean sauce
10	Tomato sauce
11	Garlic Sauce
12	Black Pepper Sauce
13	Marinade sauce

## Annex II

If more than One food products are applied for the Certification, the audit team shall determined if the products are in the same series of food product base on the ingredients of the food products. Test plan for Certification, Recertification, Surveillance Assessment and Open Market Testing would be established, as below:

Assume Product 1,2....N under same series of product,

### A. Certification & Recertification

TEST		Products under Same Series			
		Product 1	Product 2	Product ....	Product N
Preservative (sorbic acid), ppm		*			
Preservative (benzoic acid), ppm		*			
Colouring Matters <sup>a</sup>		*			
<ul style="list-style-type: none"> <li>● Sudan I/II/III/IV</li> <li>● Sudan Red 7B</li> <li>● Sudan Orange G</li> <li>● Dimethyl Yellow</li> </ul>					
Heavy metal contaminations, mg/Kg	Antimony	*			
	Arsenic (inorganic)	*			
	Cadmium	*			
	Chromium	*			
	Lead	*	*	*	*
	Mercury (total)	*	*	*	*
	Tin	*			
Microbiological limits	Coliform	*			
	E. Coli count	*			
	Mould & Yeast	*			
	Salmonellae	*			
	Staphylococcus aureus	*			
	Total plate count	*	*	*	*
Melamine, mg/kg		*			
Migration test for food contacting plastic surfaces (EU Regulation (EU) No. 10/2011), if applicable		*			

Remark:

- a. Appropriate colouring test item(s) shall base on ingredients, and then determine and document in the test plan.

The test items in “\*” shall be tested in Certification and Recertification processes.

#### B. Surveillance Assessment

All products under same series of product shall be tested at least once within the three years certification program, the scenario below would be the example for the test plan of the Seasonal product and Non-Seasonal Product in the same series of food product:

##### B1. Seasonal Product:

There are Two Surveillance Assessments for the Three years audit program, test plan for the food products would be:

Surveillance Assessment	Products of same series by same production line	Heavy metal contaminations, Lead	Microbiological limits	
			Total plate count	Staphylococcus aureus
1 <sup>st</sup>	Product 1, (5, 9, if any)		*	
	Product 2, (6, 10, if any)		*	
2 <sup>nd</sup>	Product 3, (7, 11, if any)		*	
	Product 4, (8, 12, if any)		*	

The test items in “\*” shall be tested in Surveillance Assessment.

If the above three years test cycle cannot be fulfilled due to insufficient number of products (less than 4 products), the test cycle shall be continue from product 1 after the last product of the series has been tested.

B2. Non-Seasonal Product:

As per condition set out in Administrative Regulations clause 8, there are Five Surveillance Assessments (see below) or (ii) Two Surveillance Assessments (see B1) for the Three years audit program.

Surveillance Assessment	Products of same series by same production line	Heavy metal contaminations, Lead	Microbiological limits	
			Total plate count	Staphylococcus aureus
1 <sup>st</sup>	Product 1 (11, if any)		*	
	Product 2 (12, if any)		*	
2 <sup>nd</sup>	Product 3 (13, if any)		*	
	Product 4 (14, if any)		*	
3 <sup>rd</sup>	Product 5 (15, if any)		*	
	Product 6 (16, if any)		*	
4 <sup>th</sup>	Product 7 (17, if any)		*	
	Product 8 (18, if any)		*	
5 <sup>th</sup>	Product 9 (19, if any)		*	
	Product 10 (20, if any)		*	

The test items in “\*” shall be tested in Surveillance Assessment.

If the above three years test cycle cannot be fulfilled due to insufficient number of products (less than 10 products), the test cycle shall be continue from product 1 after the last product of the series has been tested.

C. Open Market Testing

TEST		Products under Same Series			
		Product 1	Product 2	Product ...	Product N
Microbiological limits	Staphylococcus aureus	*	*	*	*
	Total plate count	*	*	*	*

Sampling of Open Market Testing shall be done from open market between the 13<sup>th</sup> to 24<sup>th</sup> months after the certification.

Annex III

Additional Quality Control Test Item (for all finished products under certification) and the respective test facilities / staff competency, etc, shall follow the good operation practice such as ISO 17025, etc.

ITEM	TEST	TEST LIMIT	SAMPLING	FREQUENCY
Aflatoxin, ppb	Aflatoxin (B1, B2, G1, G2)	Less than or equal to 15	1. Finished product <sup>a</sup>  2. For the products with raw material of nuts, oil or cereal, those raw materials shall be tested <sup>b</sup>	Seasonal product - once / year / product.  Non-seasonal product - once / 6 months / product.
Heavy metal contaminations <sup>f</sup> , mg/Kg	Cadmium	Less than or equal to 0.1 <sup>c</sup>	1. Finished product <sup>a</sup>	ditto
	Chromium	Less than or equal to 1	1. Finished product <sup>a</sup>	ditto
	Arsenic (inorganic)	Less than or equal to 1.4 <sup>d</sup>	1. Finished product <sup>a</sup>	ditto
Microbiological limits	Staphylococcus aureus	Less than 20 cfu/g	1. Finished product <sup>a</sup>	ditto
	Total plate count	Less than 100,000 cfu/g <sup>e</sup>	1. Finished product <sup>a</sup>	ditto

Remarks: a. Sampling shall be done for the same category of finished products under same production line. The categorization of finished product shall be determined and documented in the test plan as appropriate. The sample size shall follow square root rule under the same category of product. (e.g. sample size is 4 for 16 products within the same category of product).

b. Sampling shall be done for the raw materials from same suppliers.

c. Less than or equal to 2 for fish, crab-meat, oysters, prawns and shrimps products.

d. Less than or equal to 10 for naturally present in specified foods such as shellfish products.

e. Test limit subject to final verification with table 1.2 of Microbiological Guidelines for Food (August 2014 (Revised)) and document in the test plan.

f. General test items / limits only. Appropriate test item(s) / limit(s) shall base on ingredients, and then determine and document in the test plan.