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Owner: Mark Beattie

Document #: GQR.PRO/58

Revision #: 10

Title: Starbucks Guidelines for Food and Beverage Suppliers

This document is the property of Starbucks Coffee Company and may not be copied or disclosed to others without authorization.

1. Purpose

This document defines food safety and quality systems requirements for Starbucks food and beverage suppliers in Company Owned markets.

2. Scope

This document applies to:

- Region(s): Global – Company Owned markets
- Product type(s): Food, Beverage, Consumer Packaged Goods
- Brand(s): Starbucks

3. Terms and Definitions

Term	Definition
HACCP	Hazard Analysis Critical Control Point
QMS	Quality Management System
EMP	Environmental Monitoring Program
GFSI	Global Food Safety Initiative
TCS	Time/Temperature Controlled for Safety
Low Risk Food Areas	Contain components/foods which are shelf stable, do not normally support the growth of pathogens, and/or will undergo a subsequent process step to control those risks.
High Care Food Areas	Contain components/foods which are shelf stable, require TCS controls to maintain safety, do not normally support the growth of pathogens, and/or will undergo a subsequent process step to control those risks
High Risk Food Areas	Contain components/foods which have undergone a cook or similar process to achieve a six log reduction for Listeria or other pathogens of concern; components/foods are considered ready-to-eat and require temperature limits to control pathogen growth)
Environmental Monitoring – Zone 1	Direct food contact surfaces
Environmental Monitoring – Zone 2	Nonfood contact areas in the plant that are immediately adjacent to food contact (Zone 1) surfaces (e.g. production equipment framework, maintenance tools used in production, overhead drip shields, etc.)

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Environmental Monitoring – Zone 3	Nonfood contact surfaces that are not close to food contact (Zone 1) surfaces (e.g. walls, floors, drains, etc.)
Environmental Monitoring – Zone 4	Areas which are completely separate from food processing zones (e.g. locker rooms, outside storage, offices)

Audit Findings Defined:

Minor:

An occasional or random failure of compliance with a requirement that does not lead to a breakdown in food safety or quality management systems or that food safety or quality is not compromised. If the issue is not corrected, it has the potential to lead to a system breakdown.

Major:

A deviation that has current potential risk to food safety or quality requirements and / or absence of evidence demonstrating compliance that could lead to a serious or systemic breakdown in food safety or quality management systems.

There is a trend of similar findings throughout the facility that shows lack of control.

Critical:

A systemic failure of compliance and there is evidence for current or imminent food safety or regulatory failure that causes public risk or contamination. There is failure of a requirement in the food safety management systems or of a critical control point.

There are severe quality trends that impact customer experience or causes product outages that would impact the brand.

There is evidence of systemic falsification of food safety system related documents and / or quality records.

A critical finding results in an automatic failure of the audit.

Not checked:

This should be used in rare circumstances. This applies to when an area or equipment is not operable or in use during the inspection. All food safety and quality management systems should be reviewed during an audit.

Not Applicable:

Only used when a requirement does not apply to the facility. Rationale to exclude should be included in the comment section.

OFI (Opportunity for Improvement):

There is compliance with a requirement in food safety or quality management systems however, the minimal requirements are being met. There are opportunities to better meet the requirements through easier or more efficient methods.

To *only* be used by Internal Starbucks Auditor, as this finding provides guidance or advise to the supplier.



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Food Safety Fundamentals:

Specific requirements within our Food Safety and Quality Audit that are designed to ensure the food safety of our products.

These audit elements can be identified through the "Offline Audit Tool".

Food Safety Fundamental findings have a different scoring system:

Classification	Regular Element	FS Fundamental
Minor	1	3
Major	3	5
Critical	15	30

4. Roles and Responsibilities

Role	Responsibility
Supplier Quality Management Team	Compliance with all aspects of this document, including prompt and, where appropriate, immediate response to nonconformities. Create the tools for Supervisors and Leads to build food safety into their routines.
Supplier Corporate Leadership	Provide timely and appropriate resources to mitigate food safety risk wherever possible. Create a culture that demands and recognizes food safety leaders throughout their company.
Starbucks SQPS Category SME	Assess and verify supplier conformance to the requirements in this document. Provide clear, concise information before, during, and after conducting an audit using this Standard.
Starbucks Corporate Leadership	Review and approve the content of this document, including the associated Audit Checklist and Guidance Tool. Recognize supplier successes in the context of food safety and quality and hold suppliers accountable for doing better.

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5. References / Attachments

Document Number	Document Title
N/A	Starbucks Standard Terms and Conditions of Purchase
GQR.FOR.135	Starbucks Guidelines for Food Suppliers Audit Checklist
Not yet assigned	Starbucks Guidelines for Food Suppliers Guidance Document

6. Revision History

Revision	Description of Changes
1	Initial Registration in Intellex System. Previous revisions in legacy system. Updates: Guidelines were updated to include EMP expectations for High Risk Food Assemblers.
2	cold chain updates 3.9
3	Updates: Guidelines were updated to include produce washing expectations, and acceptable risk-based GAP audit schemes for produce suppliers.
4	Formatting change removing highlights. No Content change.
5	Changing incorrect reference Change GQR.PRO.121 to GQR.PRO.122. Added Hyperlink to GQR.PRO.122. No Content Change
6	Updating expectation/requirements for section 4.4.2.3 Sampling shall include documented risk assessment to validate frequency, based on product and process type(s) for each facility.
7	Supplier Requirements (Introduction) reviews to minimize potential conflicts or duplication of contract language Compliance Assessment (Introduction) revised for clarity around GFSI requirements and contractual expectations All sections revised to remove redundant language and/or requirements Several sub-sections moved to new primary sections for efficiency *Added management competence requirements to <i>Management commitment and resource management</i> *Requirements for food safety-related complaints added to <i>Product complaint handling</i> Clarification/editing of requirements throughout <i>Personal Hygiene</i> Clarification/editing of requirements throughout <i>Staff facilities</i> Clarification/editing of requirements throughout <i>Layout, product flow and segregation</i> Clarification/editing of requirements throughout <i>Storage Facilities</i> Clarification/editing of requirements throughout <i>Building infrastructure</i>



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	<p>Clarification/editing of requirements throughout <i>Equipment</i></p> <p>Clarification/editing of requirements throughout <i>Maintenance</i></p> <p>Clarification/editing of requirements throughout <i>Chemical contaminant control</i></p> <p>Clarification/editing of requirements throughout <i>Cleaning and sanitation</i></p> <p>Clarification/editing of requirements throughout <i>Environmental Monitoring Program (EMP)</i></p> <p>Clarification/editing of requirements throughout <i>Utilities – water, ice, air, and other gases</i></p> <p>Clarification/editing of requirements throughout <i>Product design and development</i></p> <p>Clarification/editing of requirements throughout <i>Supplier approval and performance monitoring</i></p> <p>Clarification/editing of requirements throughout <i>Outsourcing and use of co-manufacturers</i></p> <p>Clarification/editing of requirements throughout <i>Control of Operations</i></p> <p>*Specific requirements for Label Verification and corrective action(s) added to <i>Control of operations</i></p> <p>*<u>Produce processing controls</u> subsection added to <i>Control of operations</i> section, consolidating several produce-specific process requirements</p> <p>Clarification/editing of requirements throughout <i>Calibration and control of measuring and monitoring devices</i></p> <p>Clarification/editing of requirements throughout <i>Physical contaminant control</i></p> <p>*Specific requirements for metal-detection validation and risk assessment added to <i>Physical Contaminant Control</i></p> <p>Clarification/editing of requirements throughout <i>Allergen management</i></p> <p>*Specific requirements related to allergen removal via cleaning added to <i>Allergen management</i></p> <p>Clarification/editing of requirements throughout <i>Product inspection and laboratory testing</i></p> <p>Clarification/editing of requirements throughout <i>Shipping and receiving</i></p> <p>Clarification/editing of requirements throughout <i>Preventive Control Programs</i> (formerly “HACCP”)</p> <p>Removed “<i>Audit Rating</i>” section (to be defined in <i>Guidance Document</i>)</p> <p>Removed “<i>Attachment 2: Grower-Level Food Safety Expectations for Fresh Produce</i>” due to deactivation of Starbucks GAP Audit program</p>
8	<p>Removed Settle’s Best Coffee and Tevana from Brands covered by this audit</p> <p>Changed FSQ to SQPS</p>
9	<p>Added definitions for Audit Findings and Food Safety Fundamentals along with scoring for each classification</p>



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Introduction

Supplier requirements:

The Starbucks Coffee Company Standards for Food Suppliers are established to clarify the minimum requirements for any business entities (“suppliers”) responsible for growing, manufacturing, importing, processing, packing or holding food for Starbucks Coffee Company; and to ensure that suppliers consistently deliver products which are safe and legally compliant with all applicable codes and regulations (Federal, State/Province, Local) in the countries where they are sourced, as well as in countries where the products are intended to be commercialized, and conform to agreed quality specifications.

Independent to these minimum requirements, suppliers shall always comply with local, state/provincial and federal 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 audit criteria 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. However, Starbucks reserves the right to audit any supplier to ensure Starbucks expectations are being met, including verification of requirements within this document, which may exceed GFSI expectations.

Compliance assessment:

Starbucks expects that all its food suppliers’ manufacturing facilities (including packers and distribution centers) providing Starbucks branded products, Starbucks implied products (i.e. with no brand identification) or custom-made products, will be certified to a GFSI-benchmarked certification program.

Supplier manufacturing facilities (including packers and distribution centers) 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 audit criteria by an accredited certification body may be audited against this Standard by Starbucks directly or, depending on availability, at the supplier’s cost by an external audit provider designated by Starbucks.

For certain Low Risk suppliers, Starbucks will continue with its current risk-based approval and verification program, which may include a questionnaire, review of 3rd party certification, and/or facility assessment performed by a Starbucks employee or by a designated external audit provider.

Starbucks assessment frequency is determined by multiple factors including, but not limited to, the type of products supplied, the volume of products sold to Starbucks, and the supplier’s performance history with Starbucks.



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Supplier’s 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](#))

The Starbucks Standards for Food Suppliers are subject to the definitive master purchase agreement between the supplier and Starbucks or, if no definitive agreement is in effect, to 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 risk-based preventive control 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 a national, regional, or local regulatory authority
7. Failure to notify Starbucks of (i) any food safety incident (defined as event that if left uncorrected or if impacted product went into commerce would result in a food safety regulatory violation) or activity at a facility where Starbucks’ products are handled, stored, manufactured, or produced, or (ii) any detection or discovery of product adulteration as defined by compliance with appropriate regulatory requirements (local, state, federal or any other appropriate regulatory body), including, but not limited to microbiological, chemical or physical contaminants and undisclosed allergens or ingredients.
8. Failure to notify Starbucks in advance of a Public Press Release impacting Starbucks products.
9. Failure to notify Starbucks of any material and adverse findings by the supplier’s third-party auditor with respect to the sanitation and preventive controls programs of any site where Starbucks’ products are grown, handled, stored, manufactured, or produced.
10. Failure to undertake remedial measures as mutually agreed upon in a written corrective action plan.



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1 Management Commitment & Culture

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 and quality policy statement and objectives specifying the extent of the supplier's commitment to consistently produce safe, legal products, compliant to Starbucks specifications.

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 documented Food Safety and Quality Management System. The scope should be appropriate to the range of business activities covered, including documented procedures for processes related to food safety and quality.

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

1.3 Management responsibility

1.3.1 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.

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

1.3.3 The designated leader for food safety and quality shall be independent and report to a senior company official whose objectives encompass food safety and quality.

1.3.4 The facility site shall have all appropriate registrations and/or certifications to conduct business and as appropriate grow, import, manufacture, process, pack or hold food product.

1.4 Management commitment and resource management

1.4.1 Senior food safety and quality site management shall be entrusted to individuals who have clearly demonstrated the expertise, education, and/or experience needed to effectively design and implement food safety and quality programs



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consistent with GFSI, regulatory, and customer requirements, including those within this Standard. Documentation supporting senior food safety and quality management competence shall be maintained.

1.4.2 The supplier's senior management shall provide evidence of their commitment to establish, implement, maintain and improve the food safety system. 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 in relevant food safety activities

1.5 Management review

1.5.1 The supplier's senior management shall review the verification of the food safety system and programs. at planned intervals, but at a minimum annual frequency, to ensure their continuing suitability, adequacy and effectiveness. The food safety programs 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.

1.5.2 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.

1.5.3 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.

1.6 Document control and record retention

1.6.1 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;



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- A system for the replacement of existing documents after an update is made; and
- A process for review and approval by designated and trained personnel

1.6.2 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).

1.6.3 Documents shall be available and current at all locations where they are needed to support the effective execution of operations.

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

1.6.5 All records (processes and products) and test reports shall be retained for a minimum of two years and for 12 months beyond the unopened shelf life of the product or in compliance with regulatory requirements (whichever is longer). Records pertaining to regulatory and/or marketing requirements shall be retained per those requirements.

1.6.6 The company shall store records in a manner which protects against damage, loss or environmental disasters and be available within 24 hours of request.

1.6.7 Documents must be made available when requested by regulatory authorities. Electronic records shall be provided in a commonly used and accessible format.

1.7 Internal and external audit

1.7.1 Internal audits covering the entire facility and all aspects of the food safety programs and quality management systems shall be scheduled and carried out at a defined frequency. The scope and frequency of the audits shall be established in relation to the risks associated with the activity being audited 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 by (an) appropriately qualified individual(s) 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



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- Facility must define requirements for “appropriately qualified individuals” responsible for conducting internal inspections

1.7.3 All internal auditors shall be trained in audit techniques. Internal auditors should be independent of the system or process being audited.

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 audits shall be documented.

1.7.6 Corrective and preventive action planning and implementation should begin immediately upon the receipt of internal and external audit results. Evidence must show them to be fully documented, 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 preventive action* section of this Standard.

1.8 Product complaint handling

1.8.1 Suppliers shall have a written procedure for complaint handling. All complaints shall be recorded, investigated and the results of the investigation and root cause of the issue recorded, where sufficient information is provided. Actions appropriate to the seriousness and frequency of the problems identified shall be carried out effectively by appropriately trained staff.

1.8.2 Complaints related to food safety shall be monitored continuously. Food safety related complaints shall be investigated within 24 hours of receipt and updates shall be provided to Starbucks FSQ regularly until corrective actions have been taken to address root cause.

1.8.3 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 and senior management at quarterly food safety management meetings.

1.9 Corrective and preventive action

1.9.1 The company shall be able to demonstrate that they use the information from preventive and corrective actions as appropriate to manage food safety risks.

1.9.2 The company shall have a documented procedure for handling non-conformances identified within the scope of their food safety and quality management system.

1.9.3 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.

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



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1.9.5 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 food contact packaging) from their supplier through all stages of processing and distribution to their customer and vice versa.

1.10.2 Identification of ingredients, food contact packaging, processing aids, work-in-process/semi-processed products, partially used materials, finished products, and material pending investigation, shall be adequate to ensure traceability. Lot coding 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 Traceability exercises shall include forward trace and backward trace from raw material, including food contact packaging, to finished product (accounting for distribution into the Starbucks network).

1.10.5 Traceability exercises should be achievable within 4 hours and identify 98 - 102% of product. When recovery exceeds 4 hours or falls outside of 98 - 102%:

- Root cause analysis shall be performed
- Preventive actions shall be identified and completed, and
- The traceability exercise shall be repeated to ensure compliance.

1.11 Management of incidents, product withdrawal and product recall

1.11.1 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



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- Events such as fire, flood or natural disaster
- Malicious contamination or sabotage
- Food safety concerns

1.11.2 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 withdrawal or recall impacting Starbucks product, Starbucks FSQ/QA and/or Contract Manufacturer (where appropriate) shall be notified immediately of the decision to issue a withdrawal or recall.

1.11.3 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, at 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, regulatory violation 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
- Details of external agencies providing advice and support as necessary (for example, specialist laboratories, regulatory authority and legal expertise)
- Communication plan, including the provision of information to customer, consumers and regulatory authorities in a timely manner
- Procedure shall be capable of being executed at any time. This shall be verified and documented at a defined frequency.

1.11.4 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, and
- Used (along with results from actual recalls) to review the procedure and implement improvements as necessary

1.12 Food defense & Food fraud

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- 1.12.1** A documented food fraud/food defense program that includes a vulnerability assessment and identification of appropriate mitigation strategies shall be in place to protect food products from intentional adulteration (microbiological, chemical, physical, economically-motivated, and other) that includes physical, personal and operational security measures, where appropriate.
- 1.12.2** The facility shall review the vulnerability assessment at least annually. Results shall be documented, and corrective actions shall comply with the Preventive and Corrective Actions Policy.
- 1.12.3** 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.
- 1.12.4** Where required by law, 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. This training will be documented.
- 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, at 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 third parties 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** Senior management at all levels shall regularly be trained to food safety and quality management relevant topics. Schedules and records shall be available to demonstrate attendance.



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- 2.1.7 Where personnel are engaged in activities relating to risk based preventive controls, relevant training and competency assessments shall be in place.
- 2.1.8 All staff shall be trained in food defense and site security procedures annually. Staff must be trained to report unidentified or unknown visitors.
- 2.1.9 There shall be a trained, cross functional Environmental Monitoring Program (EMP) team with clearly defined roles and responsibilities.
- 2.1.10 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.
- 2.1.11 Pest awareness training shall be provided for all employees and sightings by staff shall be reported and documented.
- 2.1.12 Cleaning staff, including applicable production employees, shall be adequately trained on all SSOPs for which they are responsible.
- 2.1.13 Activities, such as testing, direct observation, or other methods, 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.
- 2.2.2 Hand washing shall be required to ensure product protection and conform to the *Staff Facilities* section of this Standard.
- 2.2.3 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.
- 2.2.4 Watches shall not be worn High Care or High Risk production areas. If position requires use of watch for execution of duties in Low Risk areas, a specific procedure must define how risk will be controlled.
- 2.2.5 Jewelry shall not be worn, except for a plain wedding ring (i.e. no stones or carvings) 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



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- Rings and studs in exposed parts of the body, such as ears, nose, tongues and eyebrows, shall not be worn.
- Semi-permanent jewelry may be permitted if Supplier has a defined program for protection of product and the jewelry is completely protected from exposure.

2.2.6 Embellishments in clothing or other personal effects worn in production environments shall be prohibited.

2.2.7 Fingernails shall be kept short, clean and unvarnished; false fingernails shall not be worn. False eyelashes shall not be worn

2.2.8 Perfume, aftershave, or other scented products shall not be worn in production areas.

2.2.9 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.

2.2.10 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, 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 and documented medical clearance to return to work obtained as appropriate.

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



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environment; for example, removal before entering toilets, use of break areas and smoking areas.

2.4.2 Protective clothing shall be designed to prevent contamination of the product; at 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 to remove pathogens of concern and allergens.

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.

2.5 Staff facilities

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

2.5.2 Shoes, including captive shoe wear, shall be stored in a manner to prevent uniform and/or PPE contamination.

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

2.5.4 Hand-washing shall be required upon entry into all production areas with exposed food handling activities and at a frequency that is appropriate to minimize the risk of product contamination.

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

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

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



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- 2.5.7 Where provided, in-house catering facilities shall be controlled to prevent contamination of products and covered within internal audits.
- 2.5.8 Where an operation includes a high-risk or high-care area, personnel shall enter via a clearly designated changing area, 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 (e.g. controlled via PRP or captive) footwear shall be worn in the high-care and/or high-risk area. Footwear shall be maintained in a condition that does not pose a contamination risk. Supplier shall maintain a documented risk assessment for non-captive shoe wear program(s)
 - 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
 - Handwashing 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, handwashing and disinfection shall be provided
- 2.5.9 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.
- 2.5.10 All personal food brought into manufacturing premises by staff shall be appropriately stored in a clean and hygienic state. Personal food cannot be stored in employee lockers or change rooms. 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.
- 2.5.11 There shall be a policy in place for the supplier’s Food Safety & Quality department to inspect workers lockers on a regular basis at a minimum of once every six months for food safety risk and conformance to this Standard. Records shall be kept related to the execution of this program.



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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 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.
- 3.1.3 Drainage shall be adequate to prevent ingress of water or other contaminants into the facility.
- 3.1.4 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 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 The flow of waste shall be organized to minimize product contamination.
- 3.2.4 If Ready-To-Eat (RTE) food is being manufactured in the facility, there shall be a site plans/maps which designate the ways in which the risks are controlled in the RTE areas. These maps need to reflect the following at a minimum:
 - Enclosed product areas
 - Low-risk production areas (containing only components/foods which are shelf stable, do not normally support the growth of pathogens, and/or will undergo a subsequent process step to control those risks)
 - High-care production areas, if applicable (containing 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 production areas, if applicable, (containing only components/foods which have undergone a cooking or similar process to achieve a six-log



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reduction for Listeria; components/foods are considered ready-to-eat and require temperature limits to control pathogen growth)

- Routes for personnel access
- Routes for vehicle access
- Air flow and drain flow risks
- Production process flow (including raw materials and packaging)
- Routes for the removal of waste
- Routes for the movement of rework

3.2.5 There shall be a full description of the RTE areas designated as high risk and clear procedures for hygienic zoning with regard to protecting the RTE areas from unnecessary risks (e.g. foot and vehicle traffic, product, air flow, drains etc.)

3.2.6 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.

3.2.7 In low-risk areas, the process flow, along 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.

3.2.8 Where high-care areas are part of the manufacturing site, there should be physical segregation such that separation is maintained between these areas and other parts of the site. Segregation shall consider 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.

3.2.9 Where high-risk areas are part of the manufacturing site, there shall be physical segregation such that separation is maintained 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.

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

3.3 Storage facilities



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3.3.1 All facilities used for the storage of items related to Starbucks production shall be clean, well-organized and suitable for purpose. All ingredients, packaging, in-process product, and finished products shall be raised from the floor in a manner that protects against product contamination, allows for cleaning and inspection, covered when not in use, and away from the walls.

Temperature control of storage facilities shall conform to the requirements in the *Temperature control* section of this Standard.

3.3.2 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.

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

3.3.4 Raw Agricultural Commodities (RACs) shall have clear, physical segregation from RTE food.

3.3.5 Based on applicable legislation, claims and customer requirements, Supplier shall have procedures in place to manage Identity Preserved items, such as religion-related programs (for example, Kosher or Halal), dietary preference (vegetarian/non-vegetarian), or GM (genetic modification)/Non-GM.

3.3.6 Receiving 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 prescribed shelf lives.

3.3.7 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.

3.4 **Building infrastructure**

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

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

3.4.3 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.

3.4.4 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.



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- 3.4.5** 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.
- 3.4.6** 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.
- 3.4.7** 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).
- 3.4.8** 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.
- 3.4.9** Suitable and sufficient lighting shall be provided for correct operation of processes, inspection of product and effective cleaning.
- 3.4.10** Bulbs and strip lights shall be constructed of appropriate materials and protected in product handling areas. Where full protection cannot be provided, alternative management such as wire screens or monitoring procedures shall be in place.
- 3.4.11** 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.
- 3.4.12** Adequate ventilation and remediation shall be provided in product storage and processing environments to control condensation or excessive dust.
- 3.4.13** Location of exposed ventilation, heating and cooling equipment shall facilitate cleaning and maintenance and shall not pose a risk to food safety.
- 3.4.14** Screened or filtered air and positive pressure systems shall be in place in high-risk and high-care areas and adequately maintained, unless a documented risk assessment demonstrates that these systems would not provide additional protection or would potentially increase risk.

3.5 Pest Control

- 3.5.1** 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.
- 3.5.2** Qualified pest control activities shall be conducted on at least a monthly basis.



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- 3.5.3** 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.
- 3.5.4** Pest control documentation and records shall be maintained. This shall include, at 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
- 3.5.5** 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.
- 3.5.6** 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.

3.6 Equipment

- 3.6.1** 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.
- 3.6.2** The design and placement of equipment shall ensure it can be effectively cleaned and maintained. Inaccessible voids, unsanitary welds, and/or poorly maintained surfaces are examples of equipment design risks that could lead to microbial harborage.



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3.6.3 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.

3.6.4 Produce Washing Equipment (raw produce processing only)

- Equipment for washing produce shall be designed and intended for the produce type (brush washers, agitating flumes, immersion aids, etc.).
- Monitoring devices shall be calibrated per the *Calibration and Control of Measuring and Monitoring Devices* section of this Standard and adequately maintained to ensure continuous accuracy, as per manufacturer’s instructions.
- Cutting knife, peeling knife blades, conveyer belts and cutting boards used for processing produce shall be cleaned, sanitized, and inspected for physical damage at defined intervals.

3.7 Maintenance

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

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

3.7.3 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 actions taken.

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

3.7.5 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.

3.7.6 Maintenance and construction activities shall be carried out in a manner to minimize the risk of contamination of products.

3.7.7 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.

3.7.8 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.

3.7.9 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



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the individual making the temporary repair. These temporary measures shall be permanently repaired as soon as practical, and within a defined timeline.

- 3.7.10** Planned construction shall include a documented review of construction activities prior to those activities to ensure product protection is maintained. Temporary structures constructed during building work or refurbishment, etc., shall be designed/located to avoid pest harborage and ensure product safety & quality.
- 3.7.11** 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.
- 3.7.12** Outside contractors and engineers involved in the maintenance or repair activities shall be made aware of, and adhere to, the site hygiene standards.
- 3.7.13** Tools used in high-risk and high-care areas shall be dedicated to that area or shall be decontaminated upon entry to the area.
- 3.7.14** Maintenance work shall be followed by a documented hygiene clearance procedure that ensures product contamination hazards have been removed from machinery and equipment. Upon completion of any maintenance work, machinery and equipment shall be cleaned and free from contamination hazards and verified by the QA department before production is resumed.
- 3.7.15** 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.
- 3.7.16** Inoperable, defective, or inaccurate equipment shall be documented in a maintenance log and tagged (segregated, when possible) to avoid accidental use.

3.8 Chemical contaminant control

- 3.8.1** Processes shall be in place to manage the use, storage and handling of chemicals to prevent chemical contamination. These shall include, at 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
 - Absence of volatile organic compounds (VOCs) containing maintenance chemicals during production



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- 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

3.8.2 Where strongly scented or taint-forming materials must be used, e.g. for building work, procedures shall be in place to prevent the risk of product contamination.

4 Environmental Control and Sanitation

Suppliers of ready to eat (RTE) foods shall have a documented Environmental Control and Monitoring policy for controlling post processing environmental pathogens, such as *Listeria monocytogenes* and *Salmonella*, 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 the policy has been effectively communicated to all staff.
- The Environmental control and monitoring policy shall have clear objectives, targets and measures of success which are monitored and reported at a defined frequency.

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 There shall be a master sanitation plan, which covers all production and storage areas, for which records are kept regarding the appropriate execution of the plan.

4.1.3 Documented cleaning procedures shall be in place and maintained for the building, plant and all equipment. Cleaning procedures shall, at 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



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- Cleaning chemical and concentrations
- Cleaning materials to be used
- Cleaning records and responsibility for verification
- Frequencies and methods for cleaning based upon risk

4.1.4 All chemicals shall be applied according to prescribed directions and verified for adequacy, e.g. concentration, quantities, application intended use, and regulatory requirements, at a frequency appropriate to use and risk.

4.1.5 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.

4.1.6 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 sampling, microbiological sampling, allergen protein swabbing, or chemical testing, as appropriate), and
- Documentation of verification. Records shall be used to identify trends in cleaning performance and instigate improvements where required.

4.1.7 Cleaning equipment shall be fit for purpose, suitably identified for intended use (e.g. color-coded and/or labeled), cleaned, sanitized and stored in a hygienic manner to prevent contamination.

4.1.8 Cleaning equipment used to remove allergens shall either be identifiable and specific for allergen use, single-use, or effectively cleaned after use.

4.1.9 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.

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

4.1.11 Clean-in-place (CIP) equipment, where used, must be validated to be effective and accounted for in the sanitation program and fully documented, and records kept.

4.1.12 Clean-out of-place (COP) equipment, where used, must be validated to be effective and accounted for in the sanitation program and fully documented, and records kept.



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

4.1.14 Condensation or dripping resulting from cleaning activities must be identified and steps shall be taken to dry and sanitize affected areas before production starts.

4.2 Environmental Monitoring Program (EMP)

4.2.1 Starbucks RTE Food Suppliers shall define an Environmental Monitoring Program (EMP) Team. This team is responsible for developing, reviewing and updating the facility EMP at a predetermined frequency.

4.2.2 Documented environmental monitoring procedures shall be in place, maintained, and updated at a risk-based frequency for all RTE food facilities. Procedures shall, at a minimum include:

- A documented risk assessment to identify pathogens of concern and validate sampling frequency, based on product and process type(s) for each facility.
- Sampling sites, broken down by zones (1 through 4), shall be clearly defined via a comprehensive list of sites/areas to be sampled,
- Number of samples to be taken and a schedule that clearly identifies the frequency of sampling in all locations;
- Map(s) with location descriptions that correlate to the list of sampling sites/areas
- All sampling sites shall be sampled in rotation to cover the sites/areas in a specified timeframe.
- Records shall be maintained demonstrating site/area sampling compliance with the supplier’s documented risk-based frequency.
- Corrective action plans and associated records for pathogen-positive swabs and when limits are exceeded
- Responsible individuals and method of sampling and testing; if using an external laboratory, they must be accredited to ISO 17025 standards
- A facility map indicating the location of all positive pathogen sites in the past three (3) years shall be used for trending and corrective actions.
- Monitored risks through this program dually considered within the facility’s Preventive Control plan

4.2.3 If Listeria is considered to be a risk in the facility shall use Listeria spp. as an indicator for increasing the likelihood of finding Listeria monocytogenes niches.

4.2.4 If Salmonella is considered to be a risk in the facility, including potential ingredient risk, Supplier shall include that testing in its environmental monitoring program.



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4.2.5 Operational sampling of zones shall occur at a minimum designated time (e.g. four hours), after the onset of production. When equipment cannot be accessed for operational sampling, it shall be performed at the end of production, prior to cleaning, or when the equipment is idle. Additionally:

- Sampling shall be performed across all production shifts on a rotating schedule.
- After swabbing Zone 1 surfaces(s) or collecting food samples for pathogen or *Listeria* spp. testing, the food processing line(s) shall be cleaned and sanitized prior to beginning production of new batch and any implicated product shall treated as nonconforming material pending results.
- Procedures shall include steps to prevent cross-contamination of samples.

4.2.6 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. Ex/ 12x12 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 shall 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 applicable regulatory agencies, depending on jurisdiction.

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

- While testing zone 1 or foods for *Listeria* spp. or pathogens, Starbucks products associated with that line(s) shall be released only upon receiving confirmation of negative results.



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- 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. or any other pathogens on zone 1 surface(s) or in Starbucks products. Decisions and associated actions shall be documented and communicated to the Starbucks QA team. For positives found in zone 1, the plan shall require the destruction of contaminated product.
- All EMP data shall be trended using a facility map, or some similar system, to facilitate risk management.
- Any corrective actions shall be full documented

4.2.8 EMP Special Circumstances (Planned/Unplanned Events)

- Facility shall have clearly defined written 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 EMP 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).

4.2.9 EMP Corrective and Preventive Action:

4.2.9.1 RTE food suppliers shall have a documented corrective action plan for the facility EMP.

4.2.9.2 Responses to *Listeria* spp. or *Salmonella* positives for zones 1 to 4 in suppliers supplying RTE foods.:

- Immediate actions shall be taken upon finding environmental pathogens, including vectoring, cleaning and sanitation.

4.2.9.3 Sanitation, GMP, and maintenance records shall be examined by the environmental control team as part of the Investigation.

- Repeated positive results (three or more) in the same area shall require a documented root cause analysis and appropriate follow-up and corrective actions.
- Sampling frequencies shall be increased, until achieving a minimum of 3 consecutive negative swab results.



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- Environmental control 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 environmental pathogen positive(s). They shall be based on a documented risk assessment of the sample site/area.
- Swabs from investigational sampling shall not be composited.

4.2.9.4 The environmental monitoring team shall examine historical results from the affected site to analyze trends and patterns to identify the root cause of Listeria spp. positive(s).

4.2.9.5 Actions shall be clear, assigned to suitably competent persons able to address the immediate issue, and designed to prevent recurrence.

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

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

4.3 Utilities – water, ice, air and other gases

4.3.1 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 and regulations.

4.3.2 The microbiological and chemical quality of water shall be analyzed at least annually. Microbiological and chemical contaminant limits shall be documented and based on local, state, or national standards for safety and potability.

4.3.3 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.

4.3.4 Air, other gases and steam used directly in contact with or as an ingredient in products and food contact surfaces shall be food grade and 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, including supplier-defined limits, annually.

5 Commercialization and Supplier Approval



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5.1 *Product design and development*

- 5.1.1 The supplier shall have a written product development procedure that provides 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).
- 5.1.2 All new products, raw materials and changes to product formulation, packaging or methods of processing shall be formally approved by the Preventive Control team leader or authorized food safety preventive control committee member prior to use within the facility.
- 5.1.3 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.
- 5.1.4 Shelf-life trials shall be undertaken using documented protocols reflecting conditions experienced during storage and handling. Results shall be recorded and retained and shall be supported by relevant microbiological, chemical and organoleptic data. 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.
- 5.1.5 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 for each lot produced based on the product recipe. Label review for compliance shall be documented, signed and dated by the responsible individual. Documentation of review may be electronic or physical.
- 5.1.6 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 and the claim meets all appropriate regulatory requirements.

5.2 *Finished product specifications*

- 5.2.1 Starbucks formatted specifications shall be available for all Starbucks branded 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.
- 5.2.2 Changes to Starbucks Coffee Company's finished products specifications, associated processes, food contact packaging or ingredients shall not be made without the approval of Starbucks's assigned authority.



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5.3 **Supplier approval and performance monitoring**

5.3.1 The supplier shall have a documented, risk-based supplier approval program and ongoing monitoring procedures to ensure that suppliers are manufacturing products using appropriate food safety controls, effectively manage risks to raw material quality and safety, and are operating effective traceability processes. The approval and monitoring procedure shall be based on a combination of the following, based on risk:

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

5.3.2 The procedures shall define how exceptions are handled; e.g. where products are purchased from agents and a direct audit or monitoring has not been undertaken or where production schedules necessitate a truncated approval process.

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

5.3.4 Contracts or formal agreements shall exist with all service providers, e.g. pest control, laundering services, outside laboratories, waste management providers, contractors, 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, where applicable.

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

5.3.6 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.

5.3.7 Consideration shall also be given to the significance of a raw material on the food safety and 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.

5.3.8 If supplier monitoring activities identify deficiencies, relevant actions shall be defined, implemented, verified for their effectiveness and documented.

5.3.9 Incoming produce shall be purchased from a supplier/packer with current, internationally recognized GAP certification (e.g. Harmonized GAP, GLOBAL GAP, GFSI GAP programs) and compliant with all applicable local/international regulatory requirements. For example:



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- Produce grown within or imported into the US shall also comply to the provisions of US FDA Food Safety Modernization Act.
- Importers of produce to Canada for use by Starbucks in Canada will be licensed by CFIA under the Safe Foods for Canadians Regulations and will have an Importer Preventive Controls Program in place.

5.4 Raw material and packaging specifications

5.4.1 Ingredient and primary packaging specifications shall be available, adequate, accurate and demonstrate compliance to relevant finished good specification and regulatory requirements.

5.4.2 Raw material specifications and procedures shall, at a minimum, include:

- Conformance to food grade standards for all food contact packaging specifications
- Compliance with relevant food safety requirement, e.g. relevant federal, state, local and provincial regulatory requirements, as well as all components of this document 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.

5.5 Outsourcing and use of co-manufacturers

5.5.1 The supplier shall ensure that approval and monitoring of subcontractors conforms to the *Supplier approval and performance monitoring* section of this Standard.

5.5.2 Starbucks shall be notified prior to initiation of any subcontracted manufacturing. Documented approval by Starbucks FSQ representative(s) shall be maintained.

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

5.5.4 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 & Process Control

Product and process controls shall be risk based, including documented risk assessments to determine where and which controls are needed to mitigate identified risks.



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6.1 Control of operations

6.1.1 Documented risk-based process specifications and work instructions shall be available for the 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

6.1.2 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.

6.1.3 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.

6.1.4 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).

6.1.5 In the case of equipment failure or deviation of the process from specification, procedures shall be in place to isolate impacted product and establish the safety status and quality of the product to determine the action to be taken, undertake a root cause analysis and correct the problem with full documentation.

6.1.6 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 printed packaging from the previous production lot have been removed from the line before changing to the next production lot.



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Packaging which is integral to the process or equipment (e.g. the food contact layer of a multi-layer film), that does not contain customer-facing printing, AND which includes preventive controls to ensure contamination and mislabeling risks are controlled (e.g. aseptic packaging) may be allowed to remain on the line during changeovers.

6.1.7 Documented procedures shall be in place to ensure that products are packed into the correct packaging and correctly labeled for each production run. These shall include:

- Label and packaging verifications at the START of packing (first label applied),
- Label and packaging checks during the packaging run, using a documented, risk-based frequency
- Verifications following packaging changes and when changing batches/rolls of packaging materials
- Label and packaging verifications at the END of packing (last label applied),
- The procedures shall also include verification of any code information or other printing carried out offline (e.g. in print/label rooms).

6.1.8 Supplier facilities that have initiated more than one (1) Starbucks-related recall for mislabeling in the last 3 years shall install validated automated label control systems, such as traditional barcode scanners, 2D/QR code scanners, HD camera label scanners, or other vision systems, on line(s) associated with those failures.

6.1.9 Produce Processing Controls (PRODUCE PROCESSORS ONLY)

6.1.9.1 Damaged, bruised, and decaying produce shall be sorted and discarded prior to processing.

6.1.9.2 Produce Washing Controls:

Produce washing systems shall be validated based on industry standards, scientific research, and/or manufacturer's recommendations to ensure they can meet the following parameters:

- Manufacturer's recommended throughput of the washing unit shall be factored in for validating the wash process.
- Sanitizer/sanitizing solutions approved for intended use shall not require a potable rinse step and shall also conform to any applicable local or international regulatory requirements.
- Produce washing facilities shall only use produce sanitizers that are legally approved for use in that region/country:



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- Facilities located within the United States shall use sanitizers that are only listed in 21CFR173.315. Moreover, only chlorine and/or PAA type process water sanitizers shall be used for produce washing.
 - If the facility in the US is interested in using any other sanitizer type, they shall communicate this change to Starbucks FSQ and Starbucks shall evaluate the viability of this change.
 - Sanitizer concentration shall be maintained as per sanitizer manufacturer's recommendations either with inline monitoring and/or periodic manual testing via test strips and/or titration methods.
 - Where test strips are used, titration methods shall also be used to verify test strips. Test strips may verify in line monitoring.
 - Where periodic manual testing is done, cadence of manual testing shall be based on risk assessment.
 - Appropriate minimum dwell time in wash system shall be defined and shall be based on legal limits and the sanitizer manufacturer's recommendations.
 - Wash water temperature shall be appropriate for the commodity and shall be based on the sanitizer type. Water temperature shall be monitored continuously or at documented intervals and adequately maintained.
 - Wash water shall be evaluated for turbidity (e.g. via turbidimeter, visual comparison to a set standard, measurement of ATP bioluminescence) at predetermined intervals and with defined thresholds to assess water replacement frequency.
 - Proper agitation shall be included in wash flumes including air or water jets or submersion wheels.
 - Washed produce shall have an adequate de-watering period post-washing.
- 6.1.9.3** Incoming produce with higher soil and debris load shall receive an additional wash and may be minimally scrubbed to minimize contamination.
- This includes produce that contacts soil directly/indirectly while growing and/or harvesting.
 - Any produce with excessive soil loads which are unlikely to be removed via normal washing shall be graded out and discarded.
- 6.1.9.4** There shall be a clearly defined policy for initiating corrective actions in response to deviation(s) to the scheduled wash process. Deviations shall



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be addressed, tracked properly and measures shall be taken to prevent them from reoccurring.

6.1.9.5 There shall be a clearly defined policy for handling produce that has been washed with inappropriate sanitizer concentrations. They shall be placed on hold and discarded.

6.1.10 Produce Post-Washing Controls:

6.1.10.1 Post-wash, RTE produce shall be visually inspected to verify absence of soil and/or organic material.

6.1.10.2 Where initial wash does not effectively remove all visible soil/debris, cut produce shall receive an additional wash.

6.1.10.3 Produce temperature should be monitored post-wash to ensure any produce temperature increase during washing is reduced to <41F/5C as quickly as possible (ideally, within 2 hours). Where produce temperature is not monitored post-wash, appropriate controls shall be in place and verified to ensure produce/product temperature is maintained properly.

6.1.10.4 Post-wash, produce shall have a defined shelf life to be incorporated into final product and this shall be validated via shelf-life testing.

6.2 Temperature Control

6.2.1 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.

6.2.2 Where temperature control is required, the temperature shall be monitored and documented at an appropriate frequency to ensure adequate processing.

6.2.3 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.

6.2.4 All food and food handling/storage areas shall be kept at a temperature to ensure that the product maintains its safety and quality throughout its shelf life.

6.3 Quantity – Weight, Volume and Number Control

6.3.1 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.

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



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

6.4 Calibration and control of measuring and monitoring devices

6.4.1 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.

6.4.2 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

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

6.4.4 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.

6.5 Physical contaminant control

6.5.1 There shall be written procedures to control foreign materials in finished products. Foreign material findings shall be trended and reviewed during meetings specified in the Management Review section of this Standard to identify additional opportunities for their prevention and elimination.

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



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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

6.5.3 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

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

- There shall be an appropriate preventive maintenance program in place for metal food contact equipment.
- 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.

6.5.5 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, at a minimum:

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

6.5.6 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.



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Validated 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.

Historical trending of metal foreign material findings, both internally and externally reported (e.g. via customer complaints), shall be used to inform any risk assessment performed in lieu of using metal detection devices. If trending indicates a consistent pattern of failure or potential loss of control, the supplier shall install automated metal detection devices on all lines associated with these failures.

- 6.5.7** The supplier shall establish and implement documented procedures for the operation and testing of the metal detector or X-ray equipment. This shall include, at 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
- 6.5.8** 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.
 - Validation of detector operation shall be documented in statistically valid reports (one per product or product type) based on the product, the metal detector (e.g. aperture size, model, sensitivity settings, etc.), and the process (e.g. line speed, packaging, rejection mechanism timing, etc.).
 - Test pieces shall be no larger or smaller than needed to successfully produce the product without excessive false rejections or failures to reject.
 - The rationale for the procedure and frequency of metal detector verification shall be documented based on risk.
- 6.5.9** 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



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6.5.10 Checks shall be performed that test the memory/reset function of the metal detector by passing successive test packs through the unit. At a minimum, checks shall be documented immediately prior to production, immediately after production, and throughout production at defined, risk-based intervals.

Results of checks shall be recorded.

6.5.11 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

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

6.5.13 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

6.5.14 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.

6.5.15 There shall be a written policy for the use of wood pallets. 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.

6.5.16 Staples, thumb tacks, pins and paper clips shall not be used in open product areas. A system for documenting, investigating and preventing the introduction of found foreign material to the food stream must be available.

6.6 Allergen management



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6.6.1 Documented procedures shall be established to ensure the effective management of allergenic materials to prevent cross-contact into products not containing the allergen. This procedure must take into account the pertinent regulatory requirements with regard to allergens relevant to the appropriate geographic region.

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-contact 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-contact and conform to the requirements found in the *Storage facilities* section of this Standard

6.6.2 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.

6.6.3 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.

6.6.4 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.

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

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

- 6.6.6** Routes of contamination shall be risk-assessed, and procedures for handling raw materials, work-in-process and finished products documented to ensure cross-contact is avoided.
- 6.6.7** Procedures for return of non-allergen-containing raw materials, after exposure to allergens during production and processing activities, into storage shall be in place.
- 6.6.8** 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.
- 6.6.9** Supplier shall have written general procedures on how cleaning processes will be validated to remove allergens from food contact surfaces. These validation procedures shall include:
 - Who is responsible for performing and approving the validation study
 - The acceptance criteria for the study
 - Sampling procedures & analytical methods (including sensitivity of methods)
 - A documented report for each cleaning procedure being validated, outlining the execution and results of the study, that clearly indicates whether the cleaning process is valid.
 - Data supporting a conclusion that allergen residues have been reduced to an “acceptable level”
 - Corrective action(s) and re-validation activities to achieve a fully validated process, where validation is not met, based on supplier criteria
 - When revalidation will be required, e.g. frequency of validation

6.7 Product inspection and laboratory testing

- 6.7.1** There shall be a defined program of product inspection and testing as appropriate to control risks:
 - 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.



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- 6.7.2** 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.
- 6.7.3** 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 (e.g. ISO or AOAC approved), where available (For EMP 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, 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
- 6.7.4** On site labs should be under a check-sample program at least once per year.
- 6.7.5** 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
- 6.7.6** Enrichment for pathogenic organisms shall not occur in buildings/facilities where food or raw material production or storage is present.
- 6.7.7** Where food safety (i.e. pathogen, heavy metal, etc.) testing is used for product/swab analysis, the laboratory shall be accredited to ISO 17025 or equivalent. The scope of the accreditation shall cover the applicable microbiological testing.
- 6.7.8** 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.
- 6.7.9** Test records shall conform to the applicable document control and record retention requirements of this Standard.

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

6.8 Shipping and receiving

6.8.1 Raw Material and Packaging Receiving and Inspection:

6.8.1.1 The supplier shall have a documented procedure for the receipt of raw materials and packaging upon receipt. A list of raw materials and the requirements to be met for acceptance shall be available. Raw material acceptance and its release for use shall be based on procedures that define a combination of the following:

- Visual inspection with clearly defined accept or reject criteria
- A documented procedure for any variances to acceptance criteria, including exceptions (i.e. Product Exception Notice)
- 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

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

6.8.1.3 Temperature-controlled products shall not be accepted if the temperature is above previously determined temperature levels to control food safety risk. 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.

6.8.1.4 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.

6.8.2 Produce-Specific Receiving, Inspection and Storage Controls:

Starbucks suppliers shall ensure that all produce, purchased as a Raw Agricultural Commodity (RAC) and processed into an RTE ingredient, meets the following expectations. Where an RTE produce ingredient is directly procured by an



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assembler and used in Starbucks products, the assembler shall ensure upstream supplier's compliance to these minimum expectations:

6.8.2.1 Threshold limits shall be defined for receiving incoming produce:

- Incoming produce specifications shall be documented. Limits of deflection shall be defined for each produce type and shall be agreed upon by both parties (supplier and assembler). Where available, these may also be based on [USDA AMS produce grades and standards](#) or the CFIA and Canadian Fruit and Vegetable Dispute Resolution Corporation.
- RACs shall be inspected upon receiving for acceptability including, but not limited to damage, debris, foreign material, spoilage and pest activity.
- Inferior quality produce shall be rejected and handled as non-conforming material.
- Produce damaged during unloading and transit shall be discarded and documented per facility policy and traceability programs.

6.8.2.2 Internal RAC shelf-life specifications shall be developed by the supplier for each produce type. Produce lots that have reached the end of internal RAC shelf life specifications shall not be used for further processing.

6.8.3 Shipping and Transportation:

6.8.3.1 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 and using other measures such as shrink wrap, load-locks, and straps 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
- Documented compliance with temperature requirements during transport

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- Temperature verification of truck prior to loading
- Integrity of the transport vehicle
- Documented cleaning from prior loads
- Where cross-docking occurs, measures must be taken to ensure that cross-docked products do not pose a contamination risk to products being shipped from the facility.

6.8.3.2 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.

6.8.3.3 All vehicles used for the transport 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 shall be available to demonstrate on-going compliance

6.8.4 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.

6.9 Waste/Waste Disposal

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

6.9.2 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.

6.10 Control of Nonconforming Product

6.10.1 Suppliers 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.

6.10.2 Suppliers 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).



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6.10.3 Decisions and associated actions associated with nonconforming products shall be recorded in a manner that allows for review and trending.

7 Preventive Control Programs (HACCP/HARPC)

A risk based preventive control strategy using a food safety plan shall be used to control and manage food safety risks. This approach can leverage all current HACCP plans and critical control points. However, the approach must assess other risks that require controls for food safety and establish appropriate controls as needed.

Risk based preventive control plans must be compliant with local, state, and national regulations. For example, Preventive Control Plans for CFIA licensed manufacturers, exporters and importers must have measures to control food safety risk and also, non-food safety regulatory risks such as net quantity, truth in labeling, nutritional labeling, health claims, grades, origin and organic claims, and "free from" claims such as Gluten-Free, Nut Free, GMO free.

7.1 Assemble the Preventive Control Team

7.1.1 The Food Safety 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.

7.1.2 The team leader shall have an in-depth knowledge of food safety preventive control strategy and be able to demonstrate competence and experience.

The team members shall have specific knowledge of risk based preventive controls 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.

7.2 Describe the products in scope

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

7.2.2 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 Food Safety plan is based on comprehensive information sources, which are referenced and available on request.



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7.3 Describe the intended use

7.3.1 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).

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

7.4 Develop a flow diagram

7.4.1 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 Food Safety plan, 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.).

7.4.2 The 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.

7.5 Conduct a hazard analysis

7.5.1 The 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.

7.5.2 The 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

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



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7.5.4 The 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.

7.6 Determine preventive control approach

7.6.1 For each hazard that requires a preventive control, an appropriate preventive control shall be developed. This requires a logical approach and may be facilitated by use of a decision tree. Preventive controls deemed critical to food safety (e.g. CCPs) shall be those controls 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.

7.7 Establish critical limits

7.7.1 For each preventive control deemed critical to food safety (e.g. CCPs), the appropriate parameters shall be defined in order to identify clearly whether the process is in or out of control.

7.7.2 The food safety team shall validate each preventive control deemed critical to food safety (e.g. CCPs). Documentation of validation shall be based upon scientific principles, known standards or recognized bodies of knowledge.

7.7.3 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.

7.8 Establish a monitoring system for each preventive control

7.8.1 A monitoring procedure shall be established for each preventive control deemed critical to food safety (e.g. CCPs) to ensure compliance with required parameters to ensure food safety. The monitoring system shall be able to detect loss of control and provide information in time for uncontrolled product be identified and corrective action to be taken. As a guide, consideration may be given to the following, although this is not an exhaustive list:



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- 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

7.8.2 Records associated with the monitoring of each preventive control deemed critical to food safety (e.g. 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 preventive controls must conform to the *Personnel Training* portion of the Standard.

7.8.3 Records shall be kept for a minimum of two years or for the length of the shelf life, whichever is longer.

7.9 Establish a corrective action plan

7.9.1 The 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.

7.10 Establish verification procedures

7.10.1 Procedures of verification shall be established to confirm that the food safety 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 food safety team

7.10.2 Product shall not be released for shipment until verification of all preventive control deemed critical to food safety (e.g. CCPs) have been completed and approved by a second trained individual.

7.11 Preventive Control documentation and record keeping



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

7.11.2 Deviations from Food Safety 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.

7.12 Review and maintenance of the Food Safety plan

7.12.1 The food safety team shall review the Food Safety 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 Food Safety 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

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

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

- End of Document -