



# **Handling Operation Program Standards and Procedures Manual**

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## General Description of the Handling Operation Program

### Introduction

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Started as a project of Oregon State University, Washington State University, and the Washington State Department of Agriculture, Food Alliance incorporated as an independent non-profit organization in 1997.

Food Alliance's mission is to create market incentives for more socially and environmentally responsible agricultural and business practices.

Food Alliance operates a voluntary certification program based on standards that define sustainable practices. Farms, ranches and food handlers (including packers, processors and distributors) that meet Food Alliance's standards, as determined by a third-party site inspection, use Food Alliance certification to differentiate their products, strengthen their brands, and support credible claims for social and environmental responsibility. Food Alliance maintains offices in Oregon, Minnesota and California, and offers certification throughout North America.

To earn certification, farms and ranches must meet standards, including:

- Provide safe and fair working conditions
- Ensure healthy & humane care for livestock
- No added hormones or non-therapeutic antibiotics
- No genetically modified crops or livestock
- Reduce pesticide use and toxicity
- Conserve soil and water resources
- Protect wildlife habitat
- Plan for continuous improvement

Food Alliance created the Handling Operation Certification Program in 2006 to ensure the integrity and proper labeling of products with Food Alliance Certified content claims, and to provide opportunities for handling operations to distinguish themselves through commitments to sustainable practices.

Food handling operations seeking to identify and market products with Food Alliance Certified content claims must undergo a certification process. This process includes a site inspection that verifies adherence to Food Alliance Handling Operation Standards. These standards are detailed below.

## The Certification and Restricted Handler Approval Process

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### Review Handling Operation Standards

All handling operations are required to comply with the standards and policies described in this document and in the Food Alliance Handling Operation Application. Please consult the Food Alliance website ([www.FoodAlliance.org](http://www.FoodAlliance.org)) for the most up-to-date version of these documents, and for alerts on any proposed changes to standards or policies.

Questions regarding standards or policies should be directed to the Food Alliance Certification Manager (503-493-1066, ext 23 or [certification@foodalliance.org](mailto:certification@foodalliance.org)).

### Determine which Handling Operation Category fits your operation

Food Alliance recognizes three categories of handling operations:

- Category I Certified Handling Operations
- Category II Certified Handling Operations
- Category III Restricted Handling Operations

Applicants must specify the category under which they wish to apply.

#### **CATEGORY I Certified Handling Operation:**

Category I includes companies that process their own product or retain other handlers to perform manufacturing or other contract services. This category also includes operations engaged in the production of ingredients intended for further processing prior to retail packaging, as well as fruit or vegetable packing and/or packaging.

#### **CATEGORY II Certified Handling Operation:**

Category II is for operations, such as brokers or distributors, that take title to product but do not change its form. Incidental re-packing for quality control or assembling orders is allowed. (Incidental repacking shall not include reducing or dividing the net weight of any previously packaged products. Incidental repacking shall also not include alteration of previously existing label information.)

#### **CATEGORY III Restricted Handling Operation:**

Category III is for handlers retained on contract to process products intended to bear Food Alliance Certified content claims. Restricted Handling Operations must pass an audit addressing baseline requirements for handling Food Alliance Certified products. However, Restricted Handling Operations are not certified and may not make claims to being certified by Food Alliance.

### Sign the Licensing Agreement

The Licensing Agreement is part of the application packet. It outlines expectations for the relationship between Food Alliance and the operator, and provides guidelines for maintaining the certification. Terms of reference include access to information, confidentiality, compliance with standards, and legal liability. The Licensing Agreement commits the operation to guidelines for use of Food Alliance's name and certification seal on packaging and marketing materials.

## **Complete the Application**

Separate applications are required for each facility where product carrying Food Alliance certified content claims will be handled.

Both certification and the Restricted Handler approval require a site inspection to verify the accuracy of information included in the application and adherence to Food Alliance handling operation standards. The information you provide in the application helps inspectors prepare for the site inspection. The application must be completed in its entirety, and sufficient detail provided to allow Food Alliance and its site inspectors to gain a clear understanding of the operation's level of compliance with the standards. Food Alliance and its third-party inspectors will keep all information provided in the application strictly confidential.

Supporting information required as part of the application includes:

- Regulator inspection records (USDA, FDA, State Agriculture Department, DEQ, etc.).
- Documentation from other certifying authorities (Kosher, Halal, Certified Organic, etc.)
- Food safety program documents (GMP, HACCP, etc) and/or inspection reports from food safety auditors (AIB, Silliker, NSF, etc.)

In addition, Category I and III Handlers must also provide a Unique Product Application (UPA) for each product for which a certified content claim will be made.

## **Work with an inspector to schedule your site inspection**

After Food Alliance reviews your application, it will be forwarded to a site inspector who will contact you to schedule the inspection. Be prepared to provide inspectors with production records, processing management documents, and any other documentation that will demonstrate compliance with Food Alliance certification standards. Food Alliance recognizes that the records and documents available at any given operation may vary. The following are examples of the types of records inspectors may request:

- Documented process, task, or work instructions (standard operating procedures, sanitation standard operating procedures, allergen control program, inventory control systems, recall policy, etc)
- Actual production and transaction documents (work orders, batch records, production logs, blend sheets, receiving records, pick sheets, sales invoices, etc.)
- Structural pest control records of activities by in-house and/or contracted services.
- Water and energy use records and assessments, and records of recycling of materials.
- Human resources records and policies (including safety policies, employee records, etc.)
- Any other records demonstrating procedures protecting the purity and integrity of Food Alliance Certified content claims.

## **Review Inspection Report and Complete Audit Response Form**

Site inspectors record your operational practices and identify potential areas of improvement during the inspection process. Following your inspection, the site inspector completes a standardized report, which s/he submits to a Food Alliance certification review committee. A reviewer summarizes any non-compliances or related issues in an Audit Response Form, which is sent to the handler's designated contact (as specified in the application) along with the full inspection report. The Audit Response Form should be completed and returned to Food Alliance within 30 days of receipt. The reviewer will read your comments, and determine if additional follow-up is needed.

## **Certification and Restricted Handler Approval**

Category I and II Handlers will receive a Letter of Certification and Certification Certificate when all certification criteria are met. The letter will include a list of each Unique Product handled by that facility.

Category III Restricted Handlers will receive a Letter of Restricted Handler Approval when all the baseline standards are met. The Letter will identify the specific products you are approved to handle along with the name of the client(s) for which those products are handled.

## **Term of the Certification or Restricted Handler Approval**

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In most cases, inspections are required annually. The term of certification or Restricted Handler approval is one year from the date of issue. That date will be stated in the Letter of Certification or Letter of Restricted Handler Approval.

To maintain certification or Restricted Handler approval, handlers are required to submit a renewal application and schedule an annual inspection with Food Alliance no less than thirty days before the expiration of their certification or approval.

Note that supplemental inspections may be required during the term of certification or Restricted Handler approval if there are management or other significant changes that affect the status of the operation.

## **Ongoing Verification of Compliance**

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In order to ensure the Handling Operation Standards there may be ongoing verification of compliance.

### **Spot-checks**

Food Alliance reserves the right to conduct random, unannounced site inspections during the term of certification or Restricted Handler approval to ensure that standards and policies are met consistently. No additional charges are levied for these inspections. Handling operations are contractually bound to cooperate with authorized Food Alliance personnel to the fullest extent reasonable under the circumstances of any given unannounced visit.

## **Suspension and Revocation**

If in the course of an off-schedule site visit or upon the renewal inspection and subsequent review it becomes clear that a participant is not adhering to the standards, their certification or restricted handler status may be suspended. The participant is given a timeline to address the conditions of the suspension. If they choose to remedy the violation within the timeframe, their certification or restricted handler status will be restored. The certification will be revoked if the violation is not remedied.

## **Appeals**

If applicants feel the site inspector's findings, as outlined in the inspection report, are unfair or inaccurate, they may refute the inspector's claims and offer clarifications. All perceived inaccuracies of the site inspection report must be detailed in writing and submitted to the Food Alliance Certification Manager. Food Alliance will work with the operator and contact the inspector as necessary to resolve any such issues.

## **New Product Certification**

If a Food Alliance Handling Operation wishes to certify a new product prior to their next inspection date, the operation must complete and submit a UPA for the new product. A new UPA should also be submitted prior to a change in processing, ingredient list, ingredient source, or maintenance and sanitation protocols. While in many cases a new product approval or change in product approval may be granted without an on-site inspection, in some cases on-site inspection will be necessary. Food Alliance may ask the handler to submit additional documentation to determine if an on-site inspection is required (i.e. process flow diagrams, SOPs, etc). Fees for processing the new product application and revising the certification certificate may apply.

## **Fees**

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The Food Alliance Handling Operation Program involves two types of fees, as follows:

### **Inspection Fee**

The inspection fee for handling operations is the actual cost of inspection (which may vary depending upon location, number of facilities, number of production lines, etc.). A \$500 deposit is due at time of application. The balance is invoiced upon issue of the certification decision.

### **Licensing Fees**

Licensing fees are paid annually on a sliding scale based on gross sales of products for which certified content claims are asserted as detailed in the table below (Licensing Fee Schedule). If producer certification fees (which combine inspection and licensing fees) or handler licensing fees are paid to Food Alliance by an ingredient supplier, the applicant handler may subtract the cost of that ingredient to yield a net sales number upon which handler licensing fees are assessed.

Fees for the first year of certification are based upon actual sales, reported and invoiced at the end of each calendar quarter. Each succeeding year's fees are based upon the most recent year's sales of certified product.

If desired, a quarterly payment plan can also be established for the second and subsequent years of certification.

### Licensing Fee Schedule

Licensing Fee Schedule	Fee on First \$500,000	Fee on sales from \$500,001 - \$2,000,000	Fee on sales from \$2,000,001 - \$50,000,000	Fee on sales from \$50,000,001 - \$100,000,000	Fee on sales over \$100,000,000
Category I Handler	0.40%	0.20%	0.04%	0.02%	0.002%
Category II Handler	0.20%	0.20%	0.04%	0.02%	0.002%
Category III Handler	0%	0%	0%	0%	0%

(Note: Vertically integrated producer/processors do not pay licensing fees at both the producer and processor level. At the time of certification or renewal each farm or ranch involved in the enterprise pays an inspection fee of \$810. Each handling operation pays the cost of its inspection. Licensing fees are then applied to the aggregated gross sales of products that carry Food Alliance Certified content claims.)

### Geographic Scope

Food Alliance certification is offered throughout North America. All applications are processed at the National Office:

Food Alliance  
1829 NE Alberta, Suite 5  
Portland, OR 97211  
Phone 503.493.1066

## Guiding Principles

These guiding principles broadly describe the scope and objectives of the Food Alliance Handling Operation Program.

### **Legal Responsibility**

The operation's activities fully comply with all local, state, and federal legal requirements. The operation makes transparent to Food Alliance all oversight by other regulatory agencies, both public and private.

### **Nutritional Value and Truth in Labeling**

Handling operations maintain the integrity of Food Alliance Certified ingredients. Processes are carefully evaluated and selected to maintain the highest nutritional quality of the final products. Communication to the consumer is assured through clear labeling.

### **Quality Control & Food Safety**

Proper measures are in place to ensure food safety is not compromised. Operations coordinate active monitoring and evaluating to assure best practices and identify needs for improvements that may arise over time. Procedures are in place to quickly address questions or challenges raised regarding food safety or product integrity.

### **Reducing Use of Toxins and Hazardous Materials**

Operators continually assess their activities to reduce the use of chemicals that have adverse environmental impacts. Materials used for sanitation, structural pest control, waste treatment, and infrastructural maintenance are chosen to reduce overall negative consequences.

### **Resource Management & Recycling**

Dependence on natural resources for energy and transport, and reliance on materials needed for daily operations and packaging, is monitored on an ongoing basis. Efficiency increases over time. Waste streams are minimized while reuse and recycling of materials is maximized.

### **Safe & Fair Working Conditions**

Operators create a work environment with open communication about workplace safety and job satisfaction, with incentives and opportunities for development of employee skills. Consideration and effort is given to improving quality of life for employees and their communities.

### **Continual Improvement**

Operators make efforts to improve on each of the Food Alliance Handling Operation Program Guiding Principles on an ongoing basis, with progress measured and evaluated at least annually.

*(Note: Category III handlers are exempted from this continual improvement requirement.)*

# Food Alliance Handling Operation Standards

## Baseline Standards

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Following is an overview of Food Alliance Handling Operation Baseline Standards, structured around the Guiding Principles listed above. Handlers must provide documentation that shows adherence to these Standards.

## LEGAL RESPONSIBILITY

### Adherence To Local And Federal Regulations For Food Processing Facilities:

Food Alliance handling operations must follow all applicable local and federal regulations regarding processing and handling of food. Though Food Alliance may review handling operations' licenses and related documentation, Food Alliance reminds participants that they are solely responsible for compliance with local, state, and federal regulations.

### Record Keeping

Food Alliance requires that records be kept by handling operations in order to audit their performance on the Food Alliance Handling Operation Standards. All records regarding Food Alliance Certified ingredients shall be accessible for inspection and review no less than five years from the date the product leaves the custody of the handling operation.

Failure to provide inspectors and/or Food Alliance Certification Manager with adequate access to records or documentation to verify adherence to Food Alliance Handling Operation Standards may negatively affect the inspection and verification process, or jeopardize the status of existing Certified or Restricted Handlers and/or their unique products.

## NUTRITIONAL VALUE AND TRUTH IN LABELING

### Product Formulation

- 1) A Food Alliance Unique Product Application form, including a label sample and associated marketing information, exists for each product to be certified by Food Alliance (N/A for Category II handlers).
- 2) Operation has Letters of Certification on file for each supplier of products or ingredients bearing Food Alliance Certified content claims.
- 3) Only ingredients and processing aids listed as allowed in the Food Alliance Handling Operation Standards are included in the formulation.
- 4) Any given ingredient does not exist in both Food Alliance-certified and non-certified forms.
- 5) Non-agricultural additives are not used only to alter the speed of the process, improve product handling during processing, create new characteristics in the food product, recreate/improve flavors, colors, textures, or replace nutritional value lost during processing (except as required by law).
- 6) Synthetic additives are not used only to alter the speed of the process, improve product handling during processing, create new characteristics in the food product, recreate/improve flavors, colors, textures, or replace nutritional value lost during processing (except as required by law).

- 7) When synthetic additives and processing aids are used, operator investigates opportunities to reduce/eliminate their use via alternate materials and/or methods, and sets applicable timelines for implementation.
- 8) Ingredients are declared on labels using their most commonly known name.
- 9) No genetically modified organisms (GMO) or their products are used in the formulation or process.

### **Processes**

- 10) Processes are limited to physical and biological methods only. All chemical interactions occur using only Food Alliance approved ingredients and processing aids.
- 11) Use of x-ray is limited to that which is required by law.
- 12) No ionizing radiation occurs with ingredients or products at any stage of the chain of custody of all goods involved.

### **Processing Flow**

- 13) Operator has a site plan / facility sketch of the operation.
- 14) Operator has clear and accurate flow diagram(s) for each product and process, describing all relevant equipment, movements, and transformations of goods.
- 15) Food contact surfaces do not contaminate or transfer to the product.
- 16) Processing lines used for Food Alliance products do not merge or share any equipment with other lines that may be simultaneously running other products.
- 17) Work-in-progress is identified and distinguishable from non-Food Alliance goods.
- 18) Operator has a standardized procedure to handle and document processing errors.
- 19) Processing records show all ingredients, additives, and processing aids used, by quantity and lot number (if applicable).
- 20) Facility has a documented calibration system in place to ensure processing weight control is accurate.
- 21) Records show quantities of all goods used and packed out.
- 22) Final goods packages have a traceable production or lot code or "use by" date than can be used to trace ingredients to their time of receipt

### **Receiving, Storage, and Shipping**

- 23) Operation has standard procedures for checking the integrity of received goods and reporting of related concerns.
- 24) Documentation for incoming goods is verified by operation's own personnel.
- 25) All incoming packages of Food Alliance Certified ingredients have production lot numbers or codes assigned by the supplier.
- 26) Food Alliance goods are clearly and visibly marked as such.
- 27) Food Alliance goods are not stored so that they are in contact with non-Food Alliance goods.
- 28) Operation has standardized procedures for checking that outgoing carriers are suitable to carry the goods to be shipped.
- 29) Inventory records are maintained, updated regularly, and reconciled with physical counts.

### **QUALITY CONTROL AND FOOD SAFETY**

Food Alliance recognizes that many handling operations already have established Food Safety and Quality Assurance programs. If an operation can demonstrate that it already operates such programs in good standing under the supervision of other auditing agencies, Food Alliance may accept the work and associated audit reports done with other agencies as sufficient for these aspects of the Food Alliance Handling Operation program. Food Alliance will make such determinations on a

case-by-case basis as part of the application review process by evaluating the content of the reports submitted by the applicant from these other agencies. In cases where the operation does not participate in other relevant auditing programs, the full set of Food Alliance requirements will be addressed during the inspection.

### **Quality Control**

- 30) Operation has a product recall system.
- 31) Operation has a standardized procedure for responding to complaints.

### **Food Safety**

- 32) Facility has an adequate allergen control and education program to prevent the unintentional and undisclosed commingling of known allergens.
- 33) Facility has a compliance plan for the Food Allergy Labeling and Consumer Protection Act of 2004.
- 34) Facility has a documented compliance plan for the Public Health Security and Bioterrorism Preparedness and Response Act of 2002 (the Bioterrorism Act).
- 35) Facility has adequate inspection and education programs to prevent the reduction of food safety by allowing foreign material, undisclosed or unintentional adulteration of products while in its custody.
- 36) Facility has identified all critical control points in its operation where microbial contamination of products might occur, and has measures in place to minimize risks.

### **Sampling and Retention**

Category I and II Certified Handling Operations are expected to demonstrate continual improvement in this area.

## **REDUCING USE OF TOXINS AND HAZARDOUS MATERIALS**

### **Cleaning and Sanitation**

- 37) Justification is provided for using toxic or biocidal materials for cleaning and sanitation.
- 38) Operation maintains records of all cleaning and sanitation activities that impinge on Food Alliance Certified ingredients and/or products.

### **Pest Management**

- 39) Operation has mapped all areas of the facility with relevant pest management indicators so that locations of activities can be referenced between activity logs and the map(s).
- 40) Operation has records of all pest management activities done.
- 41) Justification is provided for using toxic or biocidal materials for pest management.
- 42) All toxic materials are only applied by duly licensed persons.
- 43) Chemicals are used in the minimum amounts practical.

### **Hazardous Materials Emergency Management**

Category I and II Certified Handling Operations are expected to demonstrate continual improvement in this area.

## **RESOURCE MANAGEMENT AND RECYCLING**

### **Water**

44) Source water meets potable water requirements (Federal Safe Drinking Water Act).

### **Energy Use**

Category I and II Certified Handling Operations are expected to demonstrate continual improvement in this area.

### **Packaging Materials**

45) No preservatives in packaging materials, unless specifically allowed by Food Alliance standards.

### **Recycling and Reuse; Waste Stream**

Category I and II Certified Handling Operations are expected to demonstrate continual improvement in this area.

### **Energy Cost of Distribution**

Category I and II Certified Handling Operations are expected to demonstrate continual improvement in this area.

## **SAFE AND FAIR WORKING CONDITIONS**

### **Human Resource Management Policies**

- 46) Operation has a grievance policy, encouraging employees to raise concerns without fear of termination.
- 47) Operation has a policy encouraging employees to suggest ways to improve the workplace.
- 48) Policies/procedures and job expectations communicated to employees prior to start date.

### **Minors, Children, and Family Members in the Workplace**

49) Employer only employs legal minors during non-school hours.

### **Workforce Development and New Skills Training**

Category I and II Certified Handling Operations are expected to demonstrate continual improvement in this area.

### **Compensation Practices**

Category I and II Certified Handling Operations are expected to demonstrate continual improvement in this area.

### **Employee Benefits**

Category I and II Certified Handling Operations are expected to demonstrate continual improvement in this area.

### **Worker Family Support Services**

Category I and II Certified Handling Operations are expected to demonstrate continual improvement in this area.

## **Worker Safety**

Category I and II Certified Handling Operations are expected to demonstrate continual improvement in this area.

## **Community Involvement**

Category I and II Certified Handling Operations are expected to demonstrate continual improvement in this area.

## **Continual Improvement Standards for Certified Handling Operations**

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Beyond baseline requirements, Category I and II Certified Handling Operations are expected to make annual improvements to their operations in line with Food Alliance's Guiding Principles

In the initial application for Food Alliance Handler Certification, each operation is required to:

- Indicate improvement actions they have already taken; and,
- Choose a minimum of one additional improvement action in each Guiding Principles area that they plan to address during the upcoming year. The operator may be able to justify that further improvements in a given area are not necessary or feasible if, during the inspection, the inspector is able to verify a high degree of performance in that area.

In the inspection report, the inspector will also list his/her suggested improvement actions for the upcoming year, taking into consideration improvement actions proposed in the application and information gathered during the inspection.

The Food Alliance certification committee reviewer will list improvement actions and associated implementation timeframes for the upcoming 12-month certification period in the Audit Response Form. While Certified Handlers may suggest alternatives to the improvement actions listed, final approval of improvement actions is given by the certification committee reviewer.

For handlers renewing their Food Alliance Certification, the inspector will evaluate the operation's progress on previously agreed upon improvement actions, and issue new improvement actions for the coming year. Food Alliance acknowledges that there may be cases where a particular improvement poses a major challenge to the operation and cannot be completed in a one-year timeframe. In such cases, as long as the operation shows they have taken clear steps to address the improvement action, the certification committee may approve the same improvement action for multiple years.

***Please refer to the Food Alliance Handling Operation Application for examples of suggested improvement actions in each of the Guiding Principle Areas.***

*A Note on the Evolution of these Standards: Food Alliance recognizes that the implementation of these standards requires a cooperative spirit between Food Alliance and its certified operators. Operators are encouraged to provide feedback and suggestions for improvement of the Handler Certification Program. All such input will be duly considered in light of Food Alliance's own commitment to continual improvement.*

## APPENDIX A: Definitions

Handling: Handling is the act of taking physical possession of a product whether it becomes an intermediate product or a consumer-ready final product. Handling may transform the agricultural product through processing: cooking, baking, preserving, distilling, fermenting, drying, heating, mixing, grinding, churning, separating, freezing, extracting, cutting, retail or wholesale preparation, or otherwise manufacturing of a food or food product. Handling also includes the packaging, canning or otherwise enclosing of such food in a container. Handling may involve taking physical possession of products without physically transforming them (e.g. distributing, repacking, seed cleaning, storing, etc.) Handling does not include sorting or cleaning with water only; this exemption does not apply to operations that are solely contracted by another Food Alliance operation to perform these tasks. Such contracted operations must be duly inspected by Food Alliance, and approved either as stand-alone certified operations or as Restricted Handlers.

Handler: For the purposes of this certification program, Food Alliance defines a handler as any operation that takes physical possession of a product - such as a processor, manufacturer, distributor, packer, broker, warehouse, or other entity - that processes, packs or distributes products asserting Food Alliance Certified content claims.

Handlers that seek to assert Food Alliance Certified content claims to describe or identify their product must meet the aforementioned definition of handler and the following evaluation criteria.

Distributors and wholesalers not physically transforming the product have the option to be Food Alliance Certified.

Retail operations and restaurants that sell goods or commodities in small quantities directly to consumers are not considered handlers for the purposes of this certification program and may not represent themselves as being Food Alliance Certified.

Ingredient: Any substance used in the preparation of an agricultural product that is still present in the final commercial product as consumed, either as itself, a breakdown product of itself, or as part of a reaction that occurs during processing. For the purposes of these standards, any food additive is considered an ingredient.

Synthetic: A substance that is created by a chemical process or by a process that chemically changes a substance extracted from naturally occurring plant, animal, or mineral sources, except that such term shall not apply to substances created by naturally occurring biological processes or via crystallization of dissolved materials from natural water sources.

## APPENDIX B: Additives

Food Alliance has set criteria for evaluating additives, and publishes a list of allowed non-agricultural ingredients, additives, and processing aids that may be included in products asserting Food Alliance Certified content claims. Non-synthetic non-agricultural ingredients are generally allowed, as long as they are used in accordance with criteria enumerated in the application.

All ingredients and additives must be approved by Food Alliance.

### **The following types of materials are categorically prohibited:**

- Artificial colors and flavors
- Natural Flavors used to mimic and/or replace agricultural ingredients.
- Synthetic preservatives
- Ingredients derived from genetically modified organisms (GMOs)
- Ingredients derived from livestock treated with sub-therapeutic antibiotics or growth-promoting hormones

Food Alliance uses criteria based on the USDA National Organic program when considering which synthetic materials may be used in Food Alliance Certified products.

### **Basic criteria for consideration of synthetic materials:**

- The substance cannot be produced from a natural source and there are no effective substitutes;
- The substance's manufacture, use, and disposal do not have adverse effects on the environment and are done in a manner compatible with Food Alliance Guiding Principles;
- The nutritional quality of the food is maintained when the substance is used, and the substance, itself, or its breakdown products do not have an adverse effect on human health as defined by applicable Federal regulations;
- The substance's primary use is not as a preservative or to create new characteristics or recreate or improve flavors, colors, textures, or nutritive value lost during processing, except where the replacement of nutrients is required by law;
- The substance is listed as generally recognized as safe (GRAS) by Food and Drug Administration (FDA) when used in accordance with FDA's good manufacturing practices (GMP) and contains no residues of heavy metals or other contaminants in excess of tolerances set by FDA; and
- The substance is essential for the handling of Food Alliance Certified agricultural products.

### **Allowed Synthetics in Food Alliance product handling and formulation:**

- Ammonium bicarbonate—for use only as a leavening agent
- Ammonium carbonate—for use only as a leavening agent
- Ascorbic acid
- Calcium hydroxide
- Calcium phosphates (monobasic, dibasic, and tribasic)
- Carbon dioxide
- Cellulose—for use in regenerative casings, as an anti-caking agent (non-chlorine bleached) and filtering aid
- Chlorine materials (Calcium hypochlorite; Chlorine dioxide; and Sodium hypochlorite)—only for disinfecting and sanitizing food contact surfaces, Except, That, residual chlorine levels in the water shall not exceed the maximum residual disinfectant limit under the Safe Drinking Water Act
- Citric acid
- Ethylene—allowed for postharvest ripening of tropical fruit and de-greening of citrus.
- Hydrogen peroxide
- Lecithin—must be from a non-GMO source
- Nutrient vitamins and minerals, in accordance with 21 CFR 104.20, Nutritional Quality – Guidelines For Foods
- Ozone
- Pectin
- Potassium acid tartrate
- Potassium tartrate made from tartaric acid
- Potassium carbonate
- Potassium iodide
- Silicon dioxide
- Sodium hydroxide—prohibited for use in lye peeling of fruits and vegetables
- Sulfur dioxide—for use only in wine, as long as total sulfite concentration does not exceed 100 ppm
- Tartaric acid
- Tocopherols—must be from a non-GMO source
- Xanthan gum

Food Alliance clients can petition Food Alliance to add or remove materials from the allowed Synthetics list. Each petition will be judged in accordance with the six Basic Criteria stated above. Petitions will only be accepted if the petitioner can show that there is no other alternative already included on the Allowed Synthetics List. The responsibility for justifying a change to the list rests with the petitioner.

## APPENDIX C: Food Alliance Labeling Rules for Packaged Products

Following is an overview of Food Alliance labeling rules for packaged products. Letters of Certification and/or Certification Certificates must be on file for each supplier of products or ingredients bearing Food Alliance certified content claims. Additionally, 1) Label samples must be submitted and approved by Food Alliance prior to use and 2) Licensing fees apply to all packaged products which include any of the following labeling claims. Please see Food Alliance policy “Supply chain verification requirement” regarding supply chain verification requirements for labeling packaged products.

- Grains, legumes, fresh fruits, and vegetables sold in a whole state, and primal or sub-primal cuts of meat using **“Food Alliance Certified”** content claims, and packed in boxes, plastic bags, or other containers for transport, wholesale or retail sale must contain 100% Food Alliance Certified raw product.
- Single-ingredient processed food products identified and/or labeled as **“Food Alliance Certified”** must contain 100% Food Alliance Certified raw product.
- Multi-ingredient processed food products identified and/or labeled as **“Food Alliance Certified”** must contain at least 80% Food Alliance Certified ingredients as measured by weight, not including added water and salt. No formulation may have both certified and non-certified forms of the same ingredient. (Example: Flour is one of the ingredients in a Food Alliance Certified bakery product. To be considered a Food Alliance Certified ingredient, 100% of the flour needs to be Food Alliance Certified.) Non-Food Alliance Certified ingredients in products labeled as “Food Alliance Certified” must not be derived from genetically modified organisms (GMOs) or from livestock treated with non-therapeutic antibiotics, growth-promoting hormones (including implants) or other growth promotants, and must not contain non-agricultural synthetic materials other than those found on the Food Alliance allowed synthetics list (see Food Alliance Handling Operation Standards & Procedures Manual).
- Multi-ingredient processed food products identified and/or labeled as **“Made with Food Alliance Certified Ingredients”** must contain at least 50% Food Alliance Certified ingredients as measured by weight, not including added water or salt. No formulation may have both certified and non-certified forms of the same ingredient. Non-Food Alliance Certified ingredients in products labeled as “Made with Food Alliance Certified Ingredients” must not contain non-agricultural synthetic materials other than those found on the Food Alliance allowed synthetics list (see Food Alliance Handling Operation Standards & Procedures Manual).
- An additional labeling option exists for multi-ingredient processed food products produced in Food Alliance Certified Handling Facilities which contain less than 50% (but at least 25%) Food Alliance Certified ingredients as measured by weight, not including added water or salt. (See following pages - **“Containing some Food Alliance Certified Ingredients”**.)
- All products bearing Food Alliance Certified content claims must have labeling to disclose all known ingredients.

**Letter Codes for the information that follows indicate position on package and are defined as:**

**PDP:** Principal Display Panel (*The part of a label that is most likely to be displayed, presented, shown, or examined under customary conditions of display for sale.*)

**IP:** Information Panel (*Any information panel, other than the Principal Display Panel.*)

**IS:** Ingredients Statement (*The list of ingredients contained in a product shown in their common and usual names in the descending order of predominance.*)

**“Food Alliance Certified” Products**

<b>If you want to claim:</b>	<b>“Food Alliance Certified”</b> (or similar statement)
<b>Your product:</b>	<p><b>Must</b> contain at least 80% Food Alliance Certified ingredients, not counting added water and salt.</p> <p><b>May</b> contain up to 20% Non-Food Alliance Certified ingredients, provided those ingredients are NOT derived from genetically modified organisms (GMOs) or from livestock treated with non-therapeutic antibiotics, growth-promoting hormones (including implants) or other growth promotants,</p> <p><b>MUST NOT</b> contain non-agricultural synthetic materials other than those found on the Food Alliance allowed synthetics list (see Food Alliance Handling Operation Standards &amp; Procedures Manual).</p>
<b>Your label MUST:</b>	<p>Show an ingredient statement when the product consists of more than one ingredient.</p> <p>Identify Food Alliance Certified ingredients as “Food Alliance Certified” in the ingredients statement.<sup>1</sup> (IS)</p>
<b>Your label MAY show:</b>	<p>The term “Food Alliance Certified” to modify the product name. (PDP/IP)</p> <p><i>(For meat products)</i> The term “Food Alliance Certified Grassfed” or “Food Alliance Certified Pasture Raised” to modify the product name, but ONLY if 100% of the meat ingredient(s) are Food Alliance Certified under one of these production modules. (PDP/IP)</p> <p>“X% Food Alliance Certified” or “X% Food Alliance Certified ingredients.” (Note: X must be 80% or higher) (PDP/IP)</p> <p>The Food Alliance certification seal <sup>2</sup>. (PDP/IP)</p> <p>The term “Food Alliance Certified Facility”, or variations thereof (e.g. Processed in a Food Alliance Certified Facility, Prepared in a Food Alliance Certified Handling Facility, etc.) (PDP/IP)</p> <p>Social and Environmental claims related to Food Alliance certification or Food Alliance Certified Ingredients, in accordance with Food Alliance Certification Claims Guidance document, and approved by Food Alliance. (PDP/IP)</p> <p>The Food Alliance Internet address, <a href="http://www.foodalliance.org">www.foodalliance.org</a>. (PDP/IP)</p>
<b>Your label MUST NOT show:</b>	<p>The word “Sustainable” to modify the term “Food Alliance Certified”</p>

<sup>1</sup> To identify an ingredient as Food Alliance Certified, in the ingredients statement, use the words, "Food Alliance Certified" in conjunction with the name of the ingredient, or an asterisk or other reference mark which is defined below the ingredient statement.

<sup>2</sup> Certification Seal for Food Alliance Certified Grassfed or Pasture-Raised meat products may include "Grassfed" or Pasture Raised" collars.

### **Products "Made with Food Alliance Certified Ingredients"**

<b>If you want to claim:</b>	<b>"Made with Food Alliance Certified Ingredients"</b> (or similar statement)
<b>Your product:</b>	<p><b>Must</b> contain at least 50% Food Alliance certified ingredients, not counting added water and salt.</p> <p><b>MUST NOT</b> contain non-agricultural synthetic materials other than those found on the Food Alliance allowed synthetics list (see Food Alliance Handling Operation Standards &amp; Procedures Manual).</p>
<b>Your label MUST:</b>	<p>Show an ingredient statement.</p> <p>Identify Food Alliance Certified ingredients as "Food Alliance Certified" in the ingredients statement.<sup>1</sup> (IS)</p>
<b>Your label MAY show:</b>	<p>The term "Made with Food Alliance Certified ___ (specified ingredients or food groups)." (PDP/IP)</p> <p>"X% Food Alliance Certified" or "X% Food Alliance Certified ingredients." (Note: X must be at least 50%) (PDP/IP)</p> <p>The term "Food Alliance Certified Facility", and variations thereof (e.g. Processed in a Food Alliance Certified Facility, Prepared in a Food Alliance Certified Handling Facility, etc.) (PDP/IP)</p> <p>Social and Environmental claims related to Food Alliance certification or Food Alliance Certified Ingredients, in accordance with Food Alliance Certification Claims Guidance document, and approved by Food Alliance. (PDP/IP)</p> <p>The Food Alliance Internet address, <a href="http://www.foodalliance.org">www.foodalliance.org</a>. (PDP/IP)</p>
<b>Your label MUST NOT show:</b>	<p>The term "Food Alliance Certified" to modify the product name and/or the Food Alliance certification seal</p> <p>The word "Sustainable" to modify the term "Food Alliance Certified"</p>

<sup>1</sup> To identify an ingredient as Food Alliance Certified, in the ingredients statement, use the words, "Food Alliance Certified" in conjunction with the name of the ingredient, or an asterisk or other reference mark which is defined below the ingredient statement.

**Letter Codes for the information that follows indicate position on package and are defined as:**

**PDP:** Principal Display Panel (*The part of a label that is most likely to be displayed, presented, shown, or examined under customary conditions of display for sale.*)

**IP:** Information Panel (*Any information panel, other than the Principal Display Panel.*)

**IS:** Ingredients Statement (*The list of ingredients contained in a product shown in their common and usual names in the descending order of predominance.*)

**Products “Containing some (>25%) Food Alliance Certified Ingredients”**

<b>If you want to claim:</b>	That your product contains some Food Alliance Certified ingredients (at least 25%)
<b>Your product:</b>	<p><b>Must</b> contain at least 25% Food Alliance certified ingredients, not counting added water and salt.</p> <p><b>MUST NOT</b> contain non-agricultural synthetic materials other than those found on the Food Alliance allowed synthetics list (see Food Alliance Handling Operation Standards &amp; Procedures Manual).</p>
<b>Your label MUST:</b>	<p>Show an ingredient statement.</p> <p>Identify Food Alliance Certified ingredients as “Food Alliance Certified” in the ingredients statement.<sup>1</sup> (IS)</p>
<b>Your label MAY show:</b>	<p>“X% Food Alliance Certified ingredients” when Food Alliance Certified ingredients are identified in the ingredient statement. (Note: X must be at least 25%) (IP)</p> <p>The term “Food Alliance Certified Facility”, and variations thereof (e.g. Processed in a Food Alliance Certified Facility, Prepared in a Food Alliance Certified Handling Facility, etc.) (PDP/IP)</p> <p>Social and Environmental claims related to Food Alliance Certified Ingredients, in accordance with Food Alliance Certification Claims Guidance document, and approved by Food Alliance. (IP)</p> <p>The Food Alliance Internet address, <a href="http://www.foodalliance.org">www.foodalliance.org</a>. (IP)</p>
<b>Your label MUST NOT show:</b>	<p>The term “Food Alliance Certified” to modify the product name, the term “Made with Food Alliance Certified Ingredients”, or the Food Alliance certification seal.</p> <p>The word “Sustainable” to modify the term “Food Alliance Certified”</p>

<sup>1</sup>To identify an ingredient as Food Alliance Certified, in the ingredients statement, use the words, “Food Alliance Certified” in conjunction with the name of the ingredient, or an asterisk or other reference mark which is defined below the ingredient statement.

### **Calculating the Percentage of Food Alliance Certified ingredients.**

The percentage of all Food Alliance Certified ingredients in an agricultural product sold, labeled, or represented as "Food Alliance Certified," "Made with Food Alliance Certified (specified ingredients or food group(s))," or that include Food Alliance Certified ingredients is calculated by:

- (1) Dividing the total net weight (excluding water and salt) of combined Food Alliance Certified ingredients at formulation by the total weight (excluding water and salt) of the finished product.

OR

- (2) If the product and ingredients are liquid: by dividing the fluid volume of all Food Alliance Certified ingredients (excluding water and salt) by the fluid volume of the finished product (excluding water and salt). If the liquid product is identified on the principal display panel or information panel as being reconstituted from concentrates, the calculation should be made on the basis of single-strength concentrations of the ingredients and finished product.

OR

- (3) For products containing Food Alliance Certified ingredients in both solid and liquid form: by dividing the combined weight of the solid ingredients and the weight of the liquid ingredients (excluding water and salt) by the total weight (excluding water and salt) of the finished product.

The percentage of all Food Alliance Certified ingredients in an agricultural product must be rounded down to the nearest whole number. The percentage must be determined by the handler who affixes the label on the consumer package and may be verified by Food Alliance.

## APPENDIX D: Frequently Asked Questions

### **Q: Is the information I provide in my application or during the site inspection made available to anyone else?**

A: No. All documentation and information obtained during the certification process is kept strictly confidential. Food Alliance site inspectors sign a binding confidentiality agreement. Food Alliance will not discuss applications or individual certification processes with any individual, organization or government agency unless authorized to do so by the applicant. Only those individuals involved in the certification program, including Food Alliance staff, Board of Directors, and site inspectors will have access to application records and documents.

### **Q: Do I need to be present during the site visit?**

A: Yes. We ask that all handling facility managers and decision makers be present at the time of the site inspection. In addition, we recommend the following to prepare for a site visit:

- Make sure that you have ample time for the inspection. It is important that manager(s) are present as well as the person(s) responsible for record keeping and any specific areas of expertise/responsibility pertinent to your inspection and operation (see previous discussion). Site inspections typically take from four to eight hours, depending on the size of the facility and the number of products for which you are seeking certification.
- Have records ready to show site inspector. This includes USDA, FDA, and HACCP & CGMP inspection records, production logs & batch records, other tracking documentation, and records of facility pesticide applications.
- Be prepared to describe your system of product segregation and storage. Shipments of Food Alliance Certified product must be traceable by unique lot/batch number or receiving records to the producer or handler. Internal records must demonstrate the effectiveness of your segregation systems. Sales and shipping records must indicate the unique lot/batch numbers of Food Alliance Certified finished products or ingredients.
- Be prepared to walk the inspector through your handling facility.

### **Q: Who are Food Alliance site inspectors?**

A: Food Alliance engages independent private contractors to perform on-site inspections for the certification program. Qualifications for site inspectors include working expertise, educational background, and significant knowledge of food handling, including processing and manufacturing. Site inspectors typically perform inspections part-time for Food Alliance, and may serve as consultants or inspectors for other agencies, as well.

While site inspectors have primary responsibility for representing Food Alliance to applicants during on-site evaluations, they receive no direct payment from applicants for their services.

**Q: How long will the certification process take?**

While dependent on our inspectors' schedules, it is generally possible to schedule an inspection 2-3 weeks after an application is received (provided the application submitted is complete). The certification process generally takes 6 to 8 weeks after the initial inspection. This timeframe is dependent on the number and complexity of non-compliances that need to be addressed.

**Q: How will I benefit from Food Alliance certification?**

A: Food processors and manufacturers benefit from the certification program in a variety of ways:

**Product Differentiation and Value:** Food Alliance content claims differentiate and add value to products.

**Improved Public Perception:** Food Alliance certification helps food businesses, farmers, and ranchers project an image of social and environmental responsibility grounded in a rigorous and widely respected certification program.

**Access to new markets:** Food Alliance certification helps handlers take advantage of rapidly growing markets for environmentally and socially responsible food products. Certification also offers access to Food Alliance's growing list of market partners, which includes businesses in the food service, retail, and restaurant sectors.

**Retain or Increase Market Share:** Food Alliance certification helps producers, handlers and retailers improve customer loyalty and expand their business opportunities.

**Q: Who creates the standards for the Food Alliance certification program?**

A: Food Alliance staff work with an advisory panel called the Food Alliance Stewardship Council to create our standards and evaluation criteria, based on Guiding Principles established by the Food Alliance Board of Directors. Farmers, ranchers, consumer group representatives, scientists, farm labor representatives, and environmentalists staff the Stewardship Council. (For a list of current councilors, see [www.foodalliance.org](http://www.foodalliance.org).) Food Alliance also contracts with researchers to create crop- and industry-specific standards. The practices and concepts found in the standards reflect "best management practices" developed by industry associations, public agencies, land grant universities and nonprofit organizations. Food Alliance also consults industry representatives to ensure certification standards can be practically implemented. Concerns or questions about the standards are welcome and should be addressed to our staff.

**Q: I process a multi-ingredient product that does not meet the above-mentioned 80% product weight rule, but I would like to indicate Food Alliance Certified ingredients on the product label. Does Food Alliance have labeling provisions for labeling a product as "containing Food Alliance Certified ingredients," as opposed to being Food Alliance Certified?**

A: Yes. Processed products containing between 50% and 79% Food Alliance Certified ingredients may claim "Made with Food Alliance Certified ingredients" (or similar statement) provided they adhere to product and labeling guidelines. See the Food Alliance Handling Operation Labeling Guidelines for more detail.