DOCUMENT COMPLIANCE NETWORK

SQF Edition 10 Transition Readiness Guide

Gap assessment, 90-day roadmap, and audit-readiness checklist for food manufacturers, processors, packers, and distributors

MAR 2026	JAN 2, 2027	8	40
Edition 10 published	Earliest audit date	Major changes from Edition 9	Readiness checkpoints

WHAT'S INSIDE

- How to access the Edition 10 code now that the format has changed
- Transition timeline and which edition your next audit falls under
- All eight major changes from Edition 9 explained in plain language
- Core clause weighted scoring and what it means for your rating
- A 40-point readiness self-assessment across every changed area
- A three-phase 90-day transition roadmap
- Documentation gap worksheet and the seven most common mistakes

Prepared by Document Compliance Network | documentcompliance.com

This is an original DCN planning guide. It is not the SQF Code and does not reproduce it. The official code is published by SQFI at sqfi.com.

Start Here: How to Get the Code

IMPORTANT The SQF Code is copyrighted material owned by SQFI, a division of FMI. This guide does not reproduce it. Always obtain the code directly from SQFI so you know you have the current version, and treat any third-party copy as unverified.

SQFI published SQF Edition 10 in March 2026 and moved it to a digital-first format. There is no longer a single downloadable PDF containing the full code the way Edition 9 was distributed. You access the code through an interactive Code Selector that filters requirements down to your specific scope.

Why the format changed

SQFI's stated reasoning is that a digital format supports faster updates, cross-referenced navigation between clauses, scope filtering, and multiple languages without reissuing a full document each time something changes. The practical effect is that you see only the modules and clauses that apply to your operation instead of working out which parts of a sector-wide PDF are relevant.

Generating a printable copy in six steps

- **1. Open the Code Selector.** Go to sqfi.com and find "Choose Your Code." This is the entry point for Edition 10.
- **2. Define your scope.** Select your sector, food sector categories, and site activities. Take your time: these selections determine which clauses appear.
- **3. Select the parts you need.** Most manufacturing sites need Part A, the certification protocol, plus their applicable module.
- **4. Print to PDF.** Use your browser's print function and choose "Save as PDF" as the destination.
- **5. Save with a version date.** Name the file with the date you pulled it. The digital code can be updated, so a dated file tells you whether your copy is current.
- **6. Pull the change log.** Once your category is selected, the Edition 9 to Edition 10 change document is available. It is the fastest way to scope your gap assessment.

WATCH OUT Treat your printed copy as a reference snapshot, not your controlled source of truth. The live digital code is authoritative. If your internal procedures cite code requirements, point them at the SQFI source and record the date you last verified it.

Transition Timeline

Edition 10 audits are expected to begin no earlier than January 2, 2027. That date depends on SQFI completing the GFSI benchmarking process, so it can move later. Confirm the current date with your certification body before you build a plan around it.

Which edition applies to your site

Your Audit Date	Edition Audited Against	What You Should Be Doing Now
Before the Edition 10 effective date	Edition 9	Maintain your current system. Use the window to close Edition 10 gaps early.
On or after the effective date	Edition 10	Full transition required before the audit, including culture and change management evidence.

THE DETAIL MOST SITES MISS Your audit date determines which edition applies, not your certificate renewal date. If your certificate renews in late 2026 but the audit itself lands earlier, you stay on Edition 9 for that entire cycle, which makes your transition a 2027 project rather than a 2026 one.

Planning implications

- **Audit scheduling is your main lever.** Certification bodies book months in advance. If you want a final Edition 9 cycle to buy preparation time, or you would rather move early, that conversation needs to happen now.
- **Culture evidence cannot be rushed.** The food safety culture assessment plan needs trend data to demonstrate improvement over time. A plan written four weeks before an audit has no results behind it.
- **Supplier records lag your effort.** Supplier documentation gaps take months to close because the timeline depends on your suppliers responding, not on your internal effort.

Recommended preparation window

Time Before Audit	Focus
6 to 9 months	Gap assessment, core clause mapping, change management procedure drafted
4 to 6 months	Culture assessment plan live and generating data, supplier records brought current
2 to 3 months	Internal vertical trace, competency testing, document control audit
4 to 6 weeks	Management review, close outstanding gaps, confirm edition with certification body

The Eight Major Changes

SQFI framed Edition 10 as a shift from compliance-based evaluation to performance-based evaluation. Under Edition 9, a documented procedure was substantial evidence. Under Edition 10, auditors want evidence the procedure works and that the people running it understand it.

1. Core clauses now carry weighted scoring

This is the change with the most direct financial consequence. Non-conformances raised against core clauses deduct more points than the same finding raised elsewhere in the code. According to FSNS, a minor against a core clause scores 2 points instead of 1, and a major scores 7 instead of 5.

Two sites with identical non-conformance counts can land in different rating bands depending on where the findings sit. Because a lower rating band can trigger six-month audits instead of annual ones, a few points can double your audit budget. Identify your core clauses first and prioritize gap work there.

2. Food safety culture assessment plan is mandatory

Edition 9 introduced culture as a concept. Edition 10 requires a documented assessment plan covering how you assess culture, how you document it, and how you drive improvement. A policy statement will not satisfy this. Auditors want measurable indicators, a defined method, results over time, and evidence that findings drove action.

3. Formal change management

A documented procedure is now required for changes to suppliers, raw materials, equipment, processes, and formulations, including a food safety impact assessment before implementation. Most sites manage change informally: a maintenance lead swaps a gasket material, a buyer switches to a backup supplier during a shortage, production adjusts a cook step. Edition 10 wants those decisions documented with an impact assessment and an approval trail.

4. Expanded supplier approval and audit requirements

Supplier verification carries more weight and more scrutiny, with stronger expectations around risk-based assessment, documented approval rationale, and current verification evidence. This is usually a documentation problem rather than a process problem: the supplier is sound and the relationship is fine, but the certificate expired four months ago and nobody noticed.

The Eight Major Changes, continued

5. Document control consolidated

Documentation requirements that were spread across several code sections are now consolidated into one section. This cuts both ways: compliance mapping gets easier because the requirements sit together, and gaps become more visible to auditors for exactly the same reason.

6. Vertically integrated audits

Auditors are moving away from walking the code clause by clause. Expect them to select a product or process and trace it end to end: receiving, storage, production, packaging, hold and release, distribution, examining every record and control along the path.

This exposes a specific failure mode. Systems that look complete when each function is reviewed in isolation break down at the handoffs. Receiving records that do not reconcile with production logs. A specification change that reached QA but never reached the line. Run a vertical trace on one product internally and you will find these before an auditor does.

7. Competency over completion

Training records showing attendance will not be sufficient. Auditors will assess whether people can actually explain their food safety responsibilities. Floor interviews carry more weight. An operator who can describe what they do during an allergen changeover, in their own words, is evidence. A signed training roster is paperwork.

8. Enhanced environmental monitoring

Expanded expectations around program design, sampling rationale, trend analysis, and corrective action on positive results. The reasoning behind your sampling plan matters as much as the results, and trending over time is expected rather than optional.

Edition 9 vs Edition 10 at a glance

Area	Edition 9	Edition 10
Format	Downloadable PDF, all sectors	Digital Code Selector, scope-filtered
Audit approach	Clause-by-clause verification	Vertical product tracing
Core clause scoring	Standard point values	Weighted, heavier deductions
Food safety culture	Introduced as a requirement	Documented assessment plan required
Change management	Addressed indirectly	Formal documented procedure
Training evidence	Completion records	Demonstrated competency
Document control	Spread across sections	Consolidated into one section
Philosophy	Compliance-based	Performance-based

Readiness Self-Assessment

Work through each section and check only what you can evidence today. Anything unchecked is a gap for your transition plan. Aim to complete this at least six months before your first Edition 10 audit.

Core clauses and scoring

- [ ] We have identified which clauses are designated core clauses for our scope
- [ ] Our last audit findings have been mapped against core clauses to see where weighted scoring would have hurt us
- [ ] Repeat findings from the past two audits have been root-caused and closed
- [ ] We know our current rating band and how many points separate us from the next band down

Food safety culture

- [ ] A documented food safety culture assessment plan exists
- [ ] The plan defines specific measurable indicators, not general statements
- [ ] An assessment method and cadence are defined and being followed
- [ ] We have culture assessment results from at least two time points to show a trend
- [ ] Findings from culture assessments have driven documented actions
- [ ] Senior management participation in culture activity is evidenced

Change management

- [ ] A formal written change management procedure exists
- [ ] The procedure covers suppliers, materials, equipment, processes, and formulations
- [ ] Food safety impact assessment is required before a change is implemented
- [ ] Changes require documented approval by a defined role
- [ ] Completed change records exist from the past six months
- [ ] Post-change verification is documented

Supplier approval

- [ ] Our approved supplier list is current and documents the basis for each approval
- [ ] Risk assessments exist for all raw material and packaging suppliers
- [ ] No supplier certificates, COAs, or specifications are currently expired
- [ ] A system requests supplier documents before they expire rather than after
- [ ] Supplier non-conformances are tracked through to closure

Readiness Self-Assessment, continued

Document control

- [ ] All SOPs and policies are current, approved, and version-controlled
- [ ] Only current versions are accessible at the point of use
- [ ] Obsolete documents are removed from circulation and archived
- [ ] Every document change is logged with user, date, and prior version
- [ ] Any record can be retrieved in under two minutes during an audit
- [ ] Document control responsibility is assigned to a named role

Vertical trace readiness

- [ ] We have run an internal end-to-end trace on at least one product in the past six months
- [ ] Receiving records reconcile cleanly with production records
- [ ] Production records reconcile with packaging, hold, release, and dispatch records
- [ ] Specification changes demonstrably reach the production line, not just QA
- [ ] A mock recall has been completed within the past twelve months with documented timing

Competency

- [ ] A training matrix maps required competencies to each role
- [ ] Competency is verified by assessment, not attendance alone
- [ ] Floor staff can explain their food safety responsibilities without prompting
- [ ] We have tested this by interviewing operators the way an auditor would
- [ ] Retraining is triggered by procedure changes, not only by calendar date

Environmental monitoring

- [ ] The sampling plan has a documented, risk-based rationale
- [ ] Sample sites, frequency, and organisms are justified rather than inherited
- [ ] Results are trended over time, not just recorded individually
- [ ] A defined corrective action pathway exists for presumptive positives
- [ ] Trend data has driven at least one documented program change

SCORING 35 or more checked: you are in good shape, focus on evidence depth. 25 to 34: a focused 90-day plan will close the gap. Under 25: start now and consider scheduling your next audit under Edition 9 if timing allows.

90-Day Transition Roadmap

This assumes you are starting with a functioning Edition 9 system. Adjust the pace if your self-assessment score was under 25.

DAYS 1-30 Assess and scope

- [ ] Pull your scope-specific code and the Edition 9 to 10 change log from the Code Selector
- [ ] Identify and list every core clause that applies to your operation
- [ ] Complete the readiness self-assessment in this guide
- [ ] Map your last two audit reports against core clauses
- [ ] Confirm your next audit date and applicable edition with your certification body
- [ ] Assign an owner and a target date to every gap identified
- [ ] Brief senior management on scope, resource needs, and timeline

DAYS 31-60 Build and document

- [ ] Draft and approve the food safety culture assessment plan
- [ ] Run the first culture assessment so trend data starts accumulating
- [ ] Write the change management procedure and train the roles who will use it
- [ ] Audit supplier documentation and request everything expired or missing
- [ ] Consolidate document control and remove obsolete versions from the floor
- [ ] Review the environmental monitoring sampling rationale and document the justification
- [ ] Update the training matrix to separate competency verification from attendance

DAYS 61-90 Verify and rehearse

- [ ] Run a full internal vertical trace on one product from receiving to dispatch
- [ ] Interview floor staff the way an auditor would and record the gaps
- [ ] Complete a mock recall and document the timing
- [ ] Run an internal audit against the Edition 10 requirement set
- [ ] Root-cause and close every finding, with verification of effectiveness
- [ ] Second culture assessment to establish a trend line
- [ ] Management review covering gap closure, culture data, and residual risk

Documentation Gap Worksheet

List each gap, assign an owner, and track it to closure. Print this page or rebuild it in your document control system so the trail is auditable.

Gap / Missing Item	Area	Owner	Due	Status

Seven mistakes that derail transitions

- **Treating the timeline as slack.** The extension to January 2027 feels generous until you realize culture assessment needs trend data, which means starting at least six months out.
- **Ignoring core clause weighting.** Weighted scoring means a finding against a core clause costs more. Spreading effort evenly across all clauses wastes your best preparation time.
- **Writing a culture policy instead of a plan.** A policy saying food safety matters is not an assessment plan. Auditors want a method, measures, results, and actions taken.
- **Leaving supplier records until late.** Supplier response time is outside your control. Starting document collection two months out guarantees gaps at audit.
- **Reviewing functions in isolation.** Each department can look compliant while the handoffs between them fail. Only a vertical trace surfaces this.
- **Confusing training records with competency.** Signed rosters will not satisfy Edition 10. Test whether people can explain their responsibilities unprompted.
- **Working from a stale printed copy.** The digital code can be updated between audits. A copy printed a year ago may no longer match the current requirement set.

Where DCN Fits

Most of what Edition 10 tightened is documentation discipline: current documents in the right hands, supplier records that do not lapse, change decisions with an approval trail, and evidence you can retrieve during a vertical trace without stalling the audit.

Document Compliance Network handles that layer so your team can focus on the food safety work rather than the paperwork around it.

Edition 10 Pressure Point	How DCN Addresses It
Document control consolidated and more visible to auditors	Central repository with version control, approval workflows, and only current versions in circulation
Expanded supplier approval and verification evidence	Automated document requests before expiry; suppliers submit by email with no portal logins, which lifts adoption roughly 4x over portal systems
Formal change management with an approval trail	Configurable approval workflows that record who evaluated a change and who authorized it
Vertical trace requires fast, complete record retrieval	Any record retrievable in seconds, with immutable audit trails showing every change
Competency evidence beyond attendance	Training records tied to document versions, so a procedure change triggers re-acknowledgement
Running SQF alongside BRCGS or FSMA	One system covering all three rather than parallel document sets

Useful DCN resources

- > SQF Certification Guide
- > SQF Audit Checklist
- > Supplier Audit Checklist
- > BRCGS Audit Checklist
- > FSMA Compliance Software
- > Document Repository and Version Control

See where your documentation stands

Book a walkthrough with your actual supplier list and document set.

Schedule a Demo

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