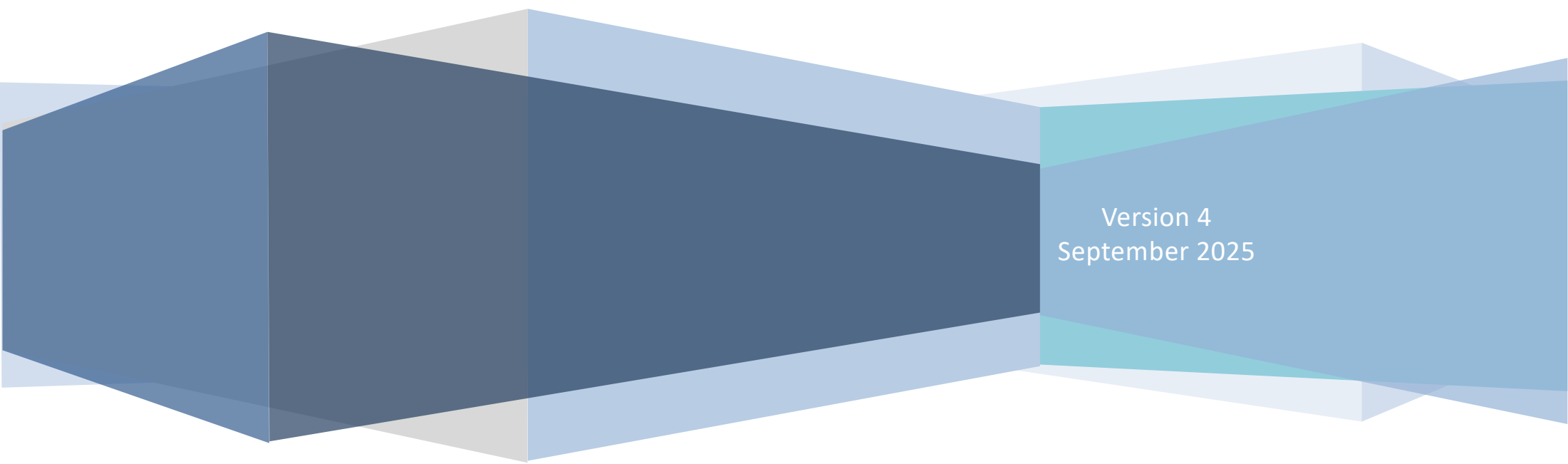


Food Store Quality Association



# Frequently Asked Questions 2025

An abstract graphic consisting of several overlapping, semi-transparent geometric shapes in various shades of blue and teal. The shapes are arranged in a way that creates a sense of depth and movement, with some shapes appearing to recede into the background while others come forward.

Version 4  
September 2025

# QUESTIONS-ANSWERS



The purpose of this document is to provide inspection bodies and inspectors with answers to the most frequently asked questions regarding the requirements of the **Food Store Quality Standard (FSQS) Version 3**.

All explanations and decisions in this document are applicable starting **1<sup>st</sup> September, 2025**.

This document is distributed to all accredited inspection bodies, accreditation organizations, and retail chains adhering to FSQA. It is available on the FSQA website: **[www.fsqa.fr](http://www.fsqa.fr)**.

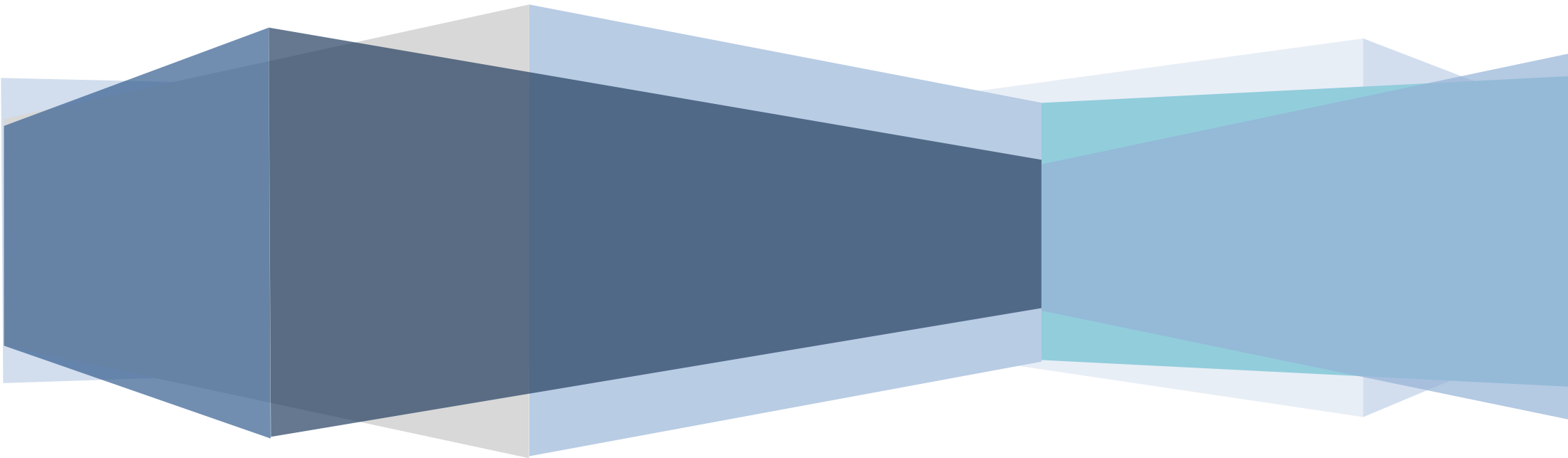
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# LABELLING

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## **Nutritional Values**

The verification of the nutritional labelling of pre-packaged products in stores has been applicable since January 1st, 2022, for all inspections conducted.

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## **Best Before Date – Use By Date**

- Labelling of a Best Before Date for a Product for which the Store's SCP Requires a Use By Date :

In which item should the mention of a Best Before Date or “preferably consume before” be evaluated on the CSU labelling of a microbiologically highly sensitive (and therefore perishable) product, when the store's SCP has required a Use By Date ?

→ Contrary to what is indicated in the interpretation guide, this is a food safety issue, so item 157 (KO) should be downgraded.

- Pre-Packaged Cheese and Distinction Between Best Before Date for the Raw Material and Use By Date for the Cut Product:

A store pre-packages cheeses with a Use By Date exceeding the initial Best Before Date and labels them upon packaging in an anti-waste range.

→ Follow the store' SCP to determine whether this practice is authorized.

- Instructions for the Removal of Best Before Dates (DDM) and Use By Dates (DLC):

Given the minimal health risk, the instruction given to Inspection Bodies (OIs) is to handle Best Before Dates (DDM) the same way as Use By Dates (DLC), meaning that stores should only be penalized if the product is not removed AFTER the date.

Thus, the packaging of a cheese where a Use By Date (DLC) is applied that matches the supplier's initial Best Before Date (DDM) is considered compliant.

## Best Before Date – Use By Date

- **Cheese Packaging:**

**Situation:** A store receives a cheese already packaged by a supplier, with a **Use By Date** and other regulatory labelling. The store does **not** open or repackage the product but adds a film and a tray around it **without affixing any store label**. The original label remains visible to the consumer. The inspector considered that, since the product was rewrapped, the **Use By Date should be J+11**.

→ If the integrity of the product is maintained and the supplier's label is visible, the supplier's use by date should be used, rather than the store's validated use by date for pre-packaged items.

- **Product Labelled in Traditional Sales Display:**

**How should we assess the presence of non-prepackaged products labelled with a Use By Date (e.g., small goat cheeses) that are displayed in a traditional sales area and have expired?**

→ As long as the consumer has access to the information, items 153/154 must be downgraded.

- **Bulk Products with an Expired Best Before Date:**

**How should we assess a bulk product that has expired, when the store displays the original label (showing the original use by / best before date)?**

- **KO 121** if the date is **not** visually accessible to the customer.
- **Downgrade item 155/156** if the date **is** visible.
- **Count one bin = one CSU in item 156.**

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## **Best Before Date – Use By Date**

- Extension of Egg Shelf Life from 21 to 28 Days

### **Applicable Only in France**

The downgrade for expired use by date on eggs should now be applied under items 153/154.

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## Non-Regulatory Labelling Mention but Included in the Store' SCP

How Should We Approach the Labelling of Food Products Considered as “Pre-Packaged Foods for Immediate Sale”?

→ Stores are required to apply all the requirements of the INCO regulation, except for character size. However, if the SCP of the store mandates additional labelling elements beyond those required by regulations, they must be respected. A downgrade should be applied if non-regulatory mentions required by the SCP are missing.

### Specific Case: Labelling the Mention “To Be Fully Cooked”

If an SCP requires the inclusion of the mention “To be fully cooked” on products where it is not legally required (e.g., minced steak prepared on demand), should the downgrade be applied under Item 126 or 127?

→ The downgrade should be applied under Item 127.



## INCO (Food Information Regulation)

- Allergen “Wheat”

If a product label mentions **WHEAT** as an allergen but **Rye and Barley** (which are listed on the supplier’s label) are missing, should the downgrade be applied under **Item 126 or 127**?

→ The downgrade should be applied under **Item 127**.

- Cereals Containing Gluten

Regarding allergen labelling, **there is no distinction between self-service sales and traditional sales**—the **specific type of gluten-containing cereal must be indicated in both cases**. A downgrade should be applied under **Item 126** if this specification is missing.

- Product: Roquefort Sausage Sold in the Traditional Section

→ The mention of the “Milk” allergen is not mandatory.

## INCO Regulation and Drive Service

Does the **INCO regulation** apply to **Drive** activity? Should the **online data** related to this activity be verified?

→ The **FSQS inspection scope** only covers the evaluation of **physical stores**. Therefore, **verifying the website is out of scope**.

## Storage Temperature

- **Labelling Anomalies Related to CSU Storage Temperatures**

### **Interpretation 1:**

Based on the grading system for **KO Item 139**, with:

- **A downgrade in Item 126** for a **temperature deviation of less than 4°C** compared to regulations:
- **Example:** “0 – 4°C” instead of “0 – 3°C” for **offal**
- **A downgrade in Items 127/128** if the deviation **exceeds 4°C**
- **Example:** “0 – 6°C” instead of “0 – 2°C”

### **Interpretation 2:**

- **Downgrade D in Item 127** (Food Safety Labelling Compliance) for **any discrepancy in storage temperature labelling**.

**Final Decision:** → **Interpretation 2 applies: Any discrepancy in labelled storage temperatures must be downgraded in Item 127.**

## Milk Labelling

### Origin of Milk in Products Containing More Than 50% Milk

In **March 2022**, **LACTALIS** successfully obtained the annulment of the decree mandating the labelling of **milk origin**. However, **retail chains have maintained this requirement**.

→ For FSQS inspections, indicating the origin of the milk is not mandatory unless specified by the store's SCP. If the origin is stated, it must be accurate. Failure to do so results in a downgrade in Item 126.

### "Raw Milk" Labelling Requirements

- Absence of the "raw milk" mention → Downgrade in Item 127
- Absence of labelling for other heat treatments → Downgrade in Item 126
- Absence of the mandatory warning "This cheese is made from raw milk. It is not recommended for vulnerable individuals, including young children." if required by the SCP → Downgrade in Item 126

### Pressed Cooked Cheeses Made from Raw Milk (e.g., Comté Wheels)

- For pressed cooked cheeses made from raw milk, indicating "raw milk" is optional.
- Absence of the mention "pressed cooked cheese" → Downgrade in Item 126.

## Method for Label Verification

- **Sampling of Ingredients in Label Verification**

**Verification of the labelling of in-store processed products containing multiple ingredients (e.g., pastries).**

Should **all ingredient labels** be checked, or should a **sample** be selected?

→ **All ingredient labels must be checked to ensure a complete list of allergens** in the final product.

- **Verification Method**

For **Items 126 and 127**, the inspector verifies:

✓ **Presence of composition and allergens.**

✗ **Does not verify the full compliance of the declared ingredient list.**

However, common sense should be applied when verifying labelling **based on product expectations**. If the **presence or absence of a processing aid** in a store-processed product leads to a modification of the ingredient list that **cannot be detected**, **major inconsistencies** must still be **downgraded**.

**Example:** A “apple tart” listing “pears” as the **first ingredient**.

**Fat Percentage and Other Mandatory Indications for Cheese**

The **fat content percentage and other legally required indications** for cheese must be **checked and properly labelled**.

## Handling of Alerts

- **Situation 1: Mismatch in Batch Number Labelling.** Issue: The **batch number** displayed on the **recall notice** does not match the one **on the product**. However, the **EAN code and Use-By Date (DLC)** are correct. This is a **supplier error**, and **neither the store, the inspector, nor the customers** can confirm that the product in question is affected by the recall.

✅ **The alert should NOT be applied.**

⚠️ **However, the inspector must notify the retailer in case of any doubt regarding the situation.**

- **Recall/Withdrawal Alerts – Incorrect Messages**

**Situation 2:** The **store receives a recall message** indicating that **X batches** must be withdrawn, along with a **recall notice** to be displayed in-store.

During inspection, the inspector finds **UVCs from a batch listed on the recall notice**, but this batch was **not included** in the initial recall message sent to the store (supplier error).

✅ **In this case, the alert is justified, even if the store is misled by a difference between the recall message and the recall notice.**

**Situation 3: Incorrect Sanitary Stamp on Recall Notice.** After receiving a **recall/withdrawal message**, the store **relied on the traceability details** (DLC/Batch Number + **Sanitary Stamp**) provided on the **consumer recall notice** issued by the retailer. However, due to a **supplier input error**, the **recall notice listed the wrong sanitary stamp**. As a result, the store **believed it was not affected by the recall**.

**Analysis:** The **correct number was not available** on the recall notice or the internal alert system. The **store employee handling the withdrawal** may not necessarily know what a **sanitary stamp** is or how many digits it contains (e.g., a cashier following recall instructions might not recognize the error). To **avoid unnecessary product destruction**, retailers **regularly remind stores** to carefully review all recall details, including the **sanitary stamp** if listed.

✅ **Since the store followed the procedure correctly, the alert should NOT be applied.**

## Item 166: Labelling of Fruits and Vegetables

📌 **Regulation (EU) 2023/2429:** Confirmation that the marking requirements of this regulation, which came into effect on January 1st, 2025, must be assessed starting now, notably the obligation to indicate the name of the treatment molecule.

➡ **The name of the treatment molecule must indeed be stated on the label for the relevant products.**

- **Triman – Regulatory Labeling**

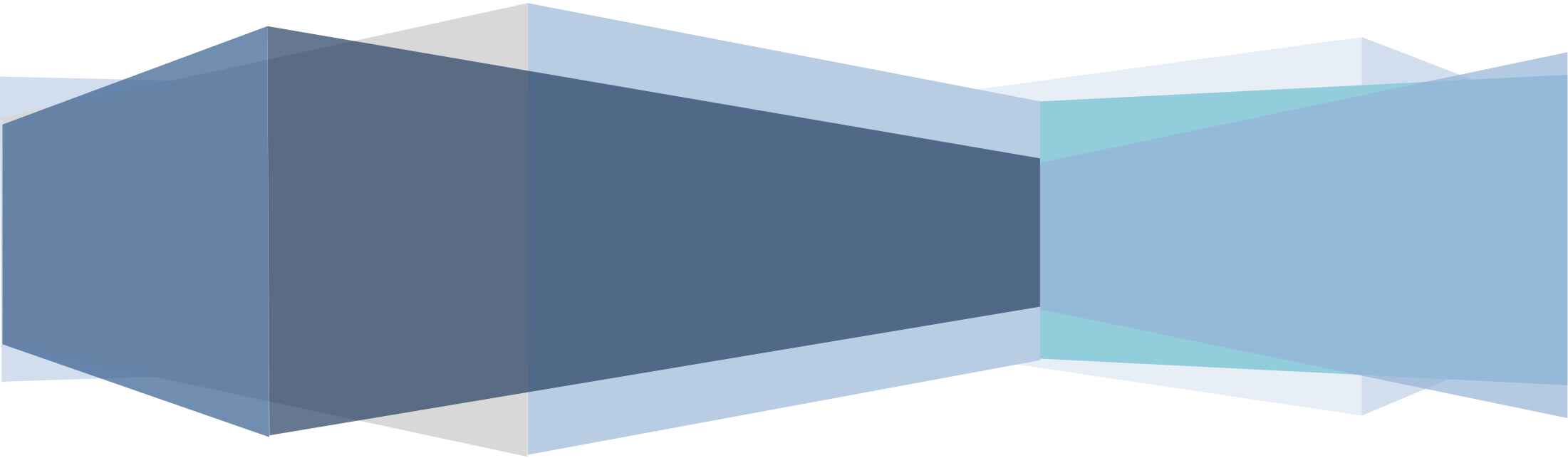
The **Triman** is a **set of logos** explaining the **waste sorting instructions** for packaging. It became **mandatory from January 1, 2023**, with a **compliance deadline** until **September 2023**. Some retailers have already **implemented it** on their **store-packaged products**, leading inspectors to ask about **inspection requirements**.

**Decision:** Since the **Triman label is not related to food safety**, it should **NOT be checked** as part of the FSQS inspection.

# SPECIFIC ACTIVITIES

- MSS -----
- Butchery -----
- Deli meats -----
- Bakery -----
- Drive -----
- Other -----
- Fruits and vegetables -----

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# SPECIFIC ACTIVITIES

## MSS



- **Item 33: Compliance with Internal Traceability**

This item, present in MSS for evaluating traceability towards professional customers, applies to all store formats in cases where sales to professional customers occur.

**Question:** Should retail outlets now maintain internal traceability to ensure product traceability for professional customers, and does this apply only to handled products (Traditional and Self-Service)?

**Answer:** This applies to **all products**, not just handled products. Refer to **Regulation 178/2002** for the mandatory information required (date, suppliers, customers, quantity, etc.).



# SPECIFIC ACTIVITIES

## Butchery



### Minced Meat

**Situation:** Transfer of minced beef steaks to the cafeteria. The steaks are **prepared in advance** (not in front of the cafeteria staff who requested them) and **used within the same day** at the cafeteria.

Depending on whether the cafeteria is considered **a store department** or **an independent business**, what are the key issues to consider and how should they be interpreted?

- Is this practice unauthorized by regulations due to advance preparation?
- Is a sanitary approval required?

**Conclusion:**  **KO 244**

### Cover Marinade:


Are cover marinades considered a technological transformation?

In this case, if the store's Use-By Date (UBD) is later than the UBD of the raw material (meat), there would be no KO for post-dating.

#### **Situation observed in store:**

Poultry products marinated on-site and vacuum-packed with an internal UBD of Day of Production + 11 (considered as processed products and thus a technological transformation by the retailer).

However, the preparation only involves a cover marinade or coating.

 **Regulatory note:** A marinade must involve immersion and a specific level of acidity.

Stores use this method when products are close to their expiry date to extend the UBD, but this does not qualify as a marinade in the technical sense.

 This is **not** considered a technological transformation. No extension of shelf life is allowed. The **KO for post-dating must be applied**.

# SPECIFIC ACTIVITIES

## Butchery



- **Minced Meat**

**Situation:** Sale of minced steaks to the cafeteria. The steaks are prepared in advance (i.e., not in front of the cafeteria staff who requested them) and used the same day in the cafeteria. Depending on whether the cafeteria is considered a “store department” or an “independent business,” what issues need to be assessed, and how should they be interpreted?

- ➡ Practice not authorized by regulation for advance preparation?
- ➡ Requirement for sanitary approval?

The FAQ previously mentioned a distinction between occasional practice (to be downgraded under **KO 207**: “unauthorized practice under regulations”) and recurrent practice (downgraded under **alert 232**: “absence of sanitary approval”).

However, since 2024, **alert 232** no longer exists. It has been replaced by **KO 244**: “absence of administrative documents.”

**Is it still relevant to maintain the distinction between occasional and permanent activity?**

- ➡ Inspection bodies and retailers agree that it is **not relevant** to maintain this distinction.
- ✅ The downgrade should be applied under **KO 244**, regardless of the frequency of the activity.

# SPECIFIC ACTIVITIES

## Deli Meats



### Hot-Held Chicken

**Case 1: Chicken displayed for sale in a hot display unit at a temperature below 63°C.**

- A **shelf-life study** validates **6 hours at ambient temperature** in self-service.
- Does displaying it in a **hot unit** invalidate the study?
- Should a **KO temperature** be applied?

**Good hygiene practice guides** allow a **12-hour sale at ambient temperature**. If **ambient temperature sale is validated**, inspectors **should not apply a KO** if the chicken is displayed in a hot unit **below 63°C**. This applies **only to products processed in a rotisserie** and sold in **self-service**, as the concept involves: **Hot packaging**, which prevents **initial contamination**. **Sealed packaging**, which prevents **secondary contamination**.

➡ **Conclusion: No KO for temperature if ambient sale is validated.**

### Case 2: Chicken Cooked On-Site

- In a concept where **chickens are cooked on-site** and **sold at ambient temperature** for a defined duration. The **label states**: “Store between 0°C and 4°C after purchase.”
- If the **sale duration is not respected**, what is the **target temperature**?
- Should a **KO temperature** be applied if chickens are not between 0°C and 4°C after the sale duration?

- ➡ **No KO temperature and no target temperature.**
- ➡ **The issue is the non-compliance with the sale duration.**
- ➡ **The downgrade should be applied under item 125.**

# SPECIFIC ACTIVITIES

## Deli Meats



### Minced Meat in the Delicatessen Section

- The store does **not have a butcher section**.
- A **meat grinder is used in the delicatessen/traiteur section** to prepare minced steaks **upon customer request**.

### Interpretation:

- Since **no specific mincing procedure items exist for the delicatessen section**, the **butchery activity must be opened** for this case.

➡ **Conclusion: Open the butchery activity in this scenario.**

# SPECIFIC ACTIVITIES

## Bakery



### HACCP – Handling of Frozen Liquid Egg Yolk

1. **Liquid egg yolk** is **frozen before** the supplier's **use-by date (DLC)**.
2. It is **defrosted after** the **supplier's DLC** to be used in **brioche dough**.
3. The **brioche dough** is then frozen raw.

#### Analysis in the FSQS Grid:

- Freezing conditions?
- Product identification?
- HACCP compliance?
- Freezing of a previously defrosted product?

➡ **Conclusion:** Downgrade in the item related to HACCP for the concept (item 227).

### Temperature Control

Where should the **temperature of the following products** be evaluated:

**Raw pizza dough, Yeast cubes, Savory tarts, Other similar products**

- This should be **determined during the preparatory visit** at the headquarters of the brand.
- For brands **without a preparatory visit**, this must be **defined during the opening meeting of the inspection**.

# SPECIFIC ACTIVITIES

## Bakery



### Ham Croissant Made In-Store

#### Situation:

A validated concept allows the use of croissants **withdrawn from sale before their DLC/DDM** as an ingredient in ham croissants.

- The product is **stuffed but not baked** before the sale.
- **Baking occurs only at the customer's home.**
- Shelf-life studies on croissants include an **organoleptic assessment**, meaning the DDM applied is shorter than the actual potential shelf life of the product.

#### Question:

If the **DDM of the stuffed croissant exceeds the initial DDM of the plain croissant**, is this considered **post-dating**?

#### ➡ Conclusion:

If the **final product is not baked before sale**, and the **croissant's DDM is extended**, then it **must be downgraded** for post-dating.

# SPECIFIC ACTIVITIES

## Drive



### Delivery / Drive

#### Situation 1: Stores Offering Drive Services but Using Third-Party Delivery Companies

For stores offering a **Drive service**, but where **delivery is handled by a third-party company mandated by the customer**, should only the **LAD (Last-Mile Delivery) activity** be opened with **storage and common steps** included?

- Does this mean the **preparation step is no longer audited**?
- Or should the **Drive activity also be included**?

#### ➡ Conclusion:

- **Open the Drive activity** if orders are placed via the retailer's website.
- **Open the LAD activity** if the order is placed through the delivery service provider's platform.

#### Situation 2: Evolution of Drive Practices – Bagless Orders & Product Protection

Many Drive services are now **offering bagless orders**, leading to **DPH (Drugstore, Perfume, Hygiene) products being mixed** with **food products** in dolly carts awaiting pickup.

#### ➡ Conclusion:

- **Item 105 should be used to assess this situation.**
- If **products are mixed**, the **downgrade should be applied here.**
- Inspectors should **evaluate the protection and packaging of fresh produce** and ensure **DPH products are separated from food items.**

# SPECIFIC ACTIVITIES

## Drive



### Responsibility of the drive activity: tare of fruit and vegetable scales

#### Item 158: Proper application of tare for weighing products sold by weight

It is the Drive staff who weigh and pack the fruits and vegetables. Are they responsible for the tare?

✅ **WG response:** The application of tare when weighing fruits and vegetables is *not* the responsibility of the drive. Item 158 should only be audited for fruits and vegetables in drives with dedicated storage.

### Responsibility of the drive activity: post-dating

Packaging of products sold in bulk (e.g., organic bulk bins). Is the drive supposed to check the date of the products it packages?  
If there is post-dating, should Item KO 121 be applied as a deduction in drive/order preparation?

✅ **WG response:** This is not the responsibility of the drive, except for drives with dedicated storage.



# SPECIFIC ACTIVITIES

## Drive



### Handling of Alerted Products Found in a Drive Order

**Context:** An **alerted product** has been **found in a Drive order**. How should the alert be assigned? The **interpretation guide** refers to **stock** but does not explicitly mention **orders**:

*“For Drive services operating on their own stock, if a recalled/withdrawn product is present in stock and its EAN is not blocked from sale, an alert is applied. However, there is no requirement to verify past sales history in the system.”*

Additionally, the **sampling specifications** state that **selected alerts must be at least 12 hours old (half a day)**.

- If a **product from an active alert** is found in an order, it means the **concerned department** failed to **remove it from stock**.
- The product could then have been **picked for a Drive order**.

### Assignment of the Alert:

- ✅ **Case 1:** The alerted product is found in the Drive's own stock → Alert is assigned to the Drive activity.
- ✅ **Case 2:** The alerted product is found in a Drive order but was picked from store shelves → Alert is assigned to the department responsible for that product.

# SPECIFIC ACTIVITIES

## Other



- Post-dating and Smoking Process

Is smoking considered a technological transformation?

According to **Regulation 852/2004**, **smoking** is indeed classified as a **technological transformation**. Therefore, when a product undergoes a smoking process, applying a **DLC (Use-by date) longer than the initial DLC of the raw material is not considered post-dating**.

- Rental of Space on the Sales Floor

Inspection of Food Activities on the Sales Floor

All **food-related activities** on the sales floor, whether **conceded or not**, must be **inspected**. However, what about **non-conceded activities** present on the sales floor that operate **independently** (separate cash register and revenue, rented space, independent management, equipment, and staff)?

### ✅ Decision:

This should be **determined during the preparatory visit** with the retailer to establish whether this type of activity falls within the **scope of the inspection**.

👉 For retailers that **do not have a preparatory visit**, this must be **defined during the opening meeting**.

# SPECIFIC ACTIVITIES

## Fruits and vegetables



### First-Range Fruits and Vegetables

During the calibration training, **Inspection Bodies** noticed a **difference in interpretation** regarding **items 108 and 168**.

Some OIs systematically **downgrade all quality issues** concerning **first-range fruits and vegetables** under **items 168/169**, whether it is a **loss of freshness** for a product that remains **marketable** or a **spoiled product that is no longer marketable**.

Other OIs apply the following differentiation:

- **Item 108** → **Loss of freshness** for a product that remains **marketable** and **shows no signs of spoilage**.
- **Item 168/169** → **Spoiled products that are no longer marketable**.

#### ✅ Conclusion:

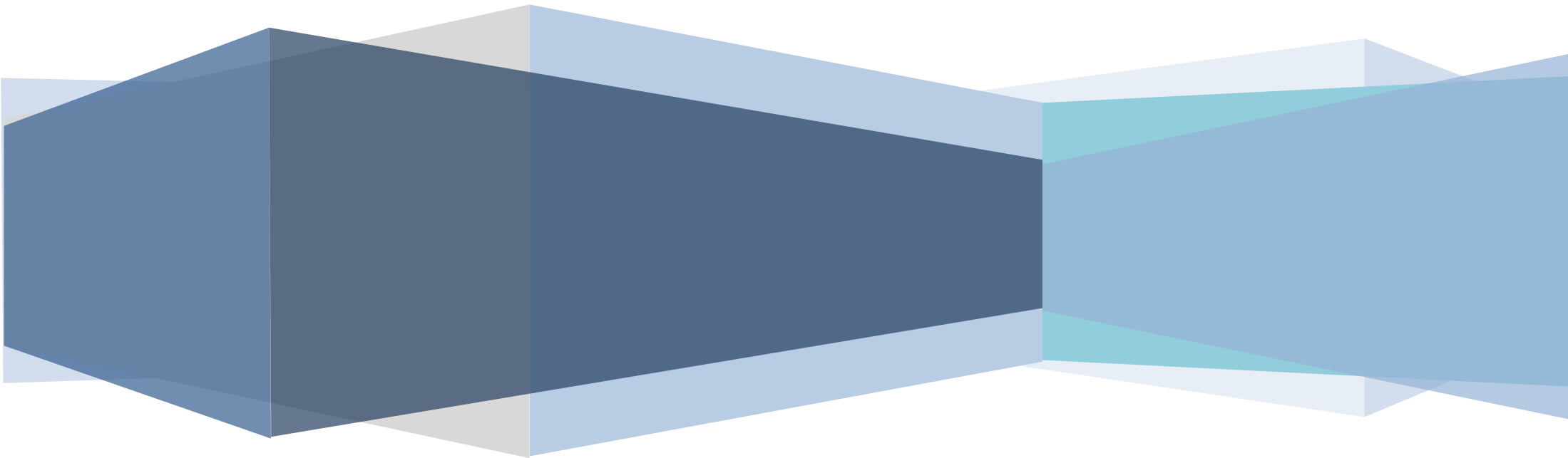
All **quality and spoilage issues** related to **first-range fruits and vegetables** should be downgraded under **items 168/169**.

👉 **Item 108** should be reserved for **other product categories**.

# INSPECTION PROTOCOL

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- Evaluation Method -----
- Calibration -----
- Shelf Life Durations -----
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# INSPECTION PROTOCOL

## Rating



### NA/A Notation – System Items Not Applicable to the Store

System items that do not apply to the store should be marked accordingly.

For example: the existence of a procedure for the decontamination of vegetables.

If the section does not involve any preparation, the preparation step should be marked as **Not Applicable (NA)**.

→ The applicable notation is **NA**.

### Double Downgrade – Double A

📌 In the case of a preparation area that is shared with the traditional counter (e.g., cheese or deli activities), how should common items (such as items on handwashing stations, work attire, cooking, reheating...) be scored?

For the **ROTISSERIE** activity, the cooking evaluation items are present under “preparation,” “traditional sale,” and “self-service sale.”

Cooking and reheating items become problematic when the rotisserie is linked to the deli counter because those items are not included under “self-service sale” (what about products sold at controlled temperatures?).

📌 Should we apply **N/E** for all these items under “sale” and evaluate them only under “preparation”?

✅ Yes, to respect the logic of **double downgrade**, there should not be a **double A**. Therefore, the items in question must be scored as **N/E** on one of the two relevant steps.

⚠️ This does not apply in cases of **sampling** (withdrawal/recall, labelling, etc.).

# INSPECTION PROTOCOL

## Evaluation Method



- **Hand-Washing Sink**

Presence of a hand-washing sink in the laboratory but absence in the traditional counter area. The sink is located just behind a swinging door separating the two areas. Does this qualify as immediate proximity?

✓ Yes, in this case, it is considered immediate proximity.

However, in all cases, the inspector must assess the risk, as the final objective remains an **obligation of result**.

- ◆ **Example:**

- If the employee needs to use a **handle** to access the hand-washing sink, it is no longer considered a swinging door by definition.
- If the situation is reversed (the hand-washing sink is in the traditional counter area but not in the laboratory, and as a result, employees do not wash their hands sufficiently), then a **downgrade applies**.

- **Item 131 specifies in downgrade D:**

*“Use of the hand-washing sink for washing food (vegetables, etc.) or any other dirty operation.”*

- ➡ Should the store be downgraded to D if it groups the hand-washing sink and the dishwashing sink with a specific non-manual faucet dedicated to hand washing?
- ➡ Is the dishwashing sink considered a dirty operation?

- ✓ Combined dishwashing/hand-washing sinks are allowed in confined spaces, provided there is a non-manual control for the hand-washing function.
- ✓ When such combinations are used, inspectors must observe employee behavior to ensure the hand-washing sink is properly used via the non-manual control.

- **Hand-Washing Sink**

- ✚ **Paper Towel Dispenser**

Validated during the January 2025 Working Group:

- Dispenser present but paper towels placed outside the dispenser in a clean area ➡ downgrade in item 131 B
- Dispenser absent ➡ downgrade in item 237 KO, even if the paper towel is placed in a hygienic zone.

**What is considered a dispenser?**

**Is there a regulatory obligation for the paper towel to be fully protected?**

➡ According to the regulation (Regulation 852/2004), the term used is “**hygienic hand-drying device**”.

✓ An unprotected paper roll dispenser is accepted if authorized by the company's SCP.

✓ The inspector's expertise will be decisive in assessing the hygienic nature of the device, particularly regarding the protection of the paper towel.

- ✚ **Soap Dispenser**

**Presence of a hand-manipulated soap bottle, in the absence of a dispenser. Should it be downgraded under item 237 or 131?**

➡ The absence of a soap dispenser does not have the same impact, as hands are washed after handling it.

✓ Pump bottles do not lead to a downgrade.

✓ In the absence of a dispenser, if the soap pouch/cartridge is manually handled to wash hands, the downgrade should be applied under item 131 D.

# INSPECTION PROTOCOL

## Evaluation Method



### Hand-Washing Sink

In the 2025 updates, we specified:


If KO 237 is applied due to a defective handwashing station, item 131 must be marked as N/E to avoid a double downgrade.

If item 131 is rated N/E, the elements specific to item 131 must be included in the comment for item 237.

### What should we do in the case where there are two handwashing stations for the same activity, one in the preparation step and the other in traditional sales?

If one of the two handwashing stations is structurally non-compliant, KO 237 should be applied.

 Either both 131 items are marked as N/E

 Or only the item corresponding to the defective handwashing station is marked as N/E and the other retains its A, B, C, or D rating.

In this second case, if the other handwashing station is unstocked, the department would receive both a KO and a -10 point downgrade — a total of -35 points for the activity.

If only one 131 item is marked as N/E, the following inconsistency arises:

- Two non-compliant handwashing stations = 1 KO
- One structurally non-compliant and one unstocked = 1 KO + 1 downgrade of -10 points

 Therefore, **both 131 items must be marked as N/E.**

### Water temperature

*What is meant by hot/cold water temperature?*

Since perception varies from one person to another, how should this be evaluated?

The **regulation** does not specify any particular water temperature. There is an obligation of *result*: the water must allow proper handwashing. Some regulations refer to *lukewarm* water.

 If the inspector finds that the water is too hot or too cold, the evaluation must be based on **questioning and observation**: ask the staff in the department to wash their hands.



# INSPECTION PROTOCOL

## Evaluation Method



### 📌 Handwashing Sink Substitution Protocol in Case of Breakdown

#### 📌 Situation 1:

Handwashing sink out of order

Store informed

Repair request made (or not)

#### 📌 Situation 2:

Store or department under renovation but still operational

Water supply cut off

Use of hydroalcoholic gel, disinfectant wipes, or another nearby sink as a replacement...

### What can be accepted as a substitution protocol?

Regulation (EC) No. 853/2004 on the hygiene of foodstuffs stipulates that food business operators must ensure that premises where food is handled are provided with adequate facilities for hygienic handwashing. However, it does not specifically address acceptable alternative solutions in the event of a handwashing system breakdown.

✅ Repair requests are often made orally, by phone; therefore, a written request should not be required.

✅ During staff interviews, ask whether a substitution solution exists, is known, and is applied. **There is an obligation of result.**

**The inspector's judgment** will determine the effectiveness of the substitution solution.

# INSPECTION PROTOCOL

## Evaluation Method



### Definition of a Remote Stand for the Use of Hand Sanitizer in the Absence of a Hand-Washing Sink

Can a remote rotisserie that is not connected to a laboratory and does not have a hand-washing sink be considered a remote stand?  
In this case, is the use of hand sanitizer tolerated?

✅ Yes, it is indeed considered a remote stand.

#### Interpretation Guide

For mini stands inside the store or in a shopping mall:

- ◆ The absence of a water point is tolerated, but a specific, formalized, and applied procedure must be in place (e.g., wearing gloves, using hand sanitizer).
- ◆ This applies to “mini remote stands” where unwrapped products are handled.

Definition of a Remote Stand :

📌 A **concept present on the store's sales floor**, which is **not physically connected to a laboratory** in the space.

# INSPECTION PROTOCOL

## Evaluation Method



- **Notation of Documentary Items in Case of an IT System Failure**

If the store's or the retailer's IT system is down at the time of the inspection, should the associated items be rated as D (or KO or alert) or N/E?

📌 Documents concerned:

- Digitized training certificates
- Microbiological analysis reports
- Product recalls and withdrawals

✅ **The rating D should be applied.**

- Digital documents (bacteriological analyses + training certificates) must be available at all times.
- If the platform is not operational at a given moment, alternative solutions should be considered, such as: Contacting the platform's customer service or the retailer's head office to retrieve the required documents.
- Documents are generally requested at the beginning of the inspection, and the store has until the closing meeting to present them.

- **Item 53: Existence of a formalized procedure for automatic tare controls**

💠 **What is considered as "automatic tare"?**

💠 **Does this item apply if a tare value is pre-recorded in a scale for assisted sales?**

✅ **Yes, item 53 applies in the mentioned case.**

This includes **automatic, semi-automatic, and pre-recorded tares** in weighing systems.

### Item 241: Formalization of Action Plans for Non-Conformities Identified During the Previous Inspection

If this item is reviewed at the beginning of the inspection, could it compromise the inspector's impartiality? Would it not risk influencing the inspector?

#### ✓ Instructions for Inspection Bodies:

- The relevance of comments should not be assessed.
- Whenever possible, this item should be reviewed at the end of the inspection.
- If the **action plan document is in paper format**, it may be collected at the beginning of the inspection but **should only be reviewed at the end**.
- When **completeness tracking tables** are available, their verification should be prioritized, as they allow assessing the **percentage of completed action plans** without going into item-specific details.
- ✗ The standard defines non-conformities as KO and Alert ratings.
- ✗ Ratings B, C, and D are considered deviations.

Thus, for **Item 241**, the ratings to be considered for **formalizing action plans** are:

#### ✓ D, KO, and Alert

However, **if the retailer's PMS requires action plans for all deviations and non-conformities (B, C, D, KO, Alert)**, then action plans should be formalized for **all ratings except A**.

- ✗ Retailers must inform their inspection bodies which ratings require formalized action plans (at a minimum: D, KO, Alert).

# INSPECTION PROTOCOL

## Evaluation Method



### SCP vs. GBPH

- The retailer has set a **DLC (use-by date) of J+3** for a meat preparation (**minced meat + salt**).
- A store belonging to this retailer **applies J+4**, which is in line with the **GBPH (Good Hygiene Practice Guides)**.
- Should **Item 157** (*Non-compliance with defined shelf life*) be downgraded?

### ✓ Response:


- The store **can refer to the GBPH** if this is done **intentionally**.
- The **inspector should investigate** to ensure it is **not an error in labeling** based on the PMS.
- If the store follows the **GBPH**, **all product characteristics must be respected** (e.g., **salt content in the preparation**).
- The product **must align with the specifications outlined in the guides**.

# INSPECTION PROTOCOL


## Evaluation Method




### Insect Killers

 **Situation:** No insect killer present in a cooking terminal. The store has an obligation of results.

A retailer contested a downgrade in a laboratory cooking terminal on the grounds that there were no insects. However, the requirement applies to traditional counters on the sales floor, even if there are no insects and no production (e.g., charcuterie).

 **236 - Pest trap placement:** Traps poorly placed or missing in areas where they are required (according to the plan, except for electric flying insect killers [EFIKs], whose absence is subject to downgrading but are generally not included in the plan). Risk of chemical contamination of food or equipment. Traps not checked, not replaced, damaged by activity, or not reinstalled after work or activity changes. EFIK not working. EFIK installed above foodstuffs.

 If the retailer's PMS requires EFIKs in non-refrigerated laboratories and traditional stands on the sales floor → downgrade applies.

 If the retailer's PMS does **not** require EFIKs:  
Absent and presence of flying insects → downgrade  
Present but not functioning → downgrade  
Absent and no insects → **no downgrade**

### Implementation of Corrective Actions for All Analyses

There is a **discrepancy between Items 29 and 31**:

- **Item 29** considers **both food product and surface analyses**.
- **Item 31** only considers **food product analyses**.

However, **corrective action plans for surface analyses** are just as necessary as for product analyses. Moreover, they are **mandatory under current regulations**.

#### ✅ Update (March 2024):

Corrective actions **must now be verified for both food product analyses and surface analyses**.

### 🚩 Staff Clothing: Definition of Dedicated Clothing and Protective Clothing

#### Item 130:

Grade A refers to “clothing dedicated to the activity.”

➡ In smaller structures, staff are polyvalent and may keep the same clothing when moving between departments.

✅ In cases of polyvalence, staff are not required to change their full outfit each time; however, they must have a specific apron system (for example, in the fish department) and/or disposable sleeves that allow them to switch activities safely. The scoring should be applied based on the retailer’s PMS and the inspector’s risk assessment.

# INSPECTION PROTOCOL

## Evaluation Method



### Meat for Animals


Products intended for **animals** (e.g., **pet food in the dry food aisles**) are **normally outside the scope** of FSQS inspections.

Does **raw meat for animals sold in butcher sections** also fall outside the scope?

#### Answer:

The **FSQS standard specifies** that the sale of **food products intended for pets** is **not within the inspection scope**. Therefore, **raw meat for animals sold in butcher sections** is also **excluded from FSQS inspections**.

### Lack of traceability in donations

 The absence of traceability in donations must be downgraded under *Item 50: Application of procedures for donations to charitable associations*.

Traceability of other professional clients must be downgraded under *Item 33 in MSS*.



# INSPECTION PROTOCOL

## Evaluation Method



### Dirty Equipment

📌 **Question 1:** For linked items 102 and 103 regarding dirty equipment, should we systematically ask whether the equipment will be cleaned again before use?

Indeed, in the interpretation guide, the A rating specifies: *“do not downgrade for dirty equipment if it is systematically cleaned/disinfected before use.”*

Does this mean the inspector should always ask: *“Will the equipment be cleaned again before use?”*

✅ The **storage location** of the equipment must be taken into account.

➡ At the dishwashing station, the equipment is stored after cleaning and ready to be used — it will **not** be cleaned again.

➡ In the stockroom, the equipment may be stored for a longer period; it's possible to find it with dust or mold due to long-term storage. In this case, it is **relevant** to ask if the equipment will be cleaned before use.

📌 **Question 2:** Inspection bodies (OIs) have raised concerns about the appropriateness of downgrading per item. Wouldn't it be more relevant to downgrade by **type of equipment** (trays, knives, preparation equipment...) or to implement a **maximum** penalty as is done for labelling issues?

Example: a bin containing multiple dirty utensils — should this be downgraded once for the bin or once per utensil?

✅ The retailers agree with both proposals:

➡ 1 downgrade **per type of equipment** (trays, knives, preparation tools, etc.)

➡ A **maximum of 3 downgrades**, all types combined, for item 103 (i.e., **-30 points maximum**)

## Non-Food Contact Approved Paper Towels

### ◆ Situation:

Inspectors may occasionally find **non-food contact approved** paper towels (**identifiable by their color and absence of a certification logo**).

### ◆ Penalty Item:

Should the **penalty be applied under Item 133: *Proper Handwashing or Glove Change, No Unprotected Wounds?***

### ◆ Evaluation Method:

The assessment is **visual**, checking:

- **Operators handling, preparing, or selling products**
- **Equipment used**

### ◆ Clarification:

The “D” rating in Item 133 already specifies:

- **Risk of contamination** on exposed food or food-contact surfaces
- **Failure to wash hands or change gloves after dirty tasks or before hygienic operations**
- **Handwashing at an inadequate water source**
- **Unhygienic hand-drying practices** (e.g., dirty cloths, clothing)

✂ **Conclusion:** The use of non-food contact approved paper towels falls under improper hand hygiene, justifying a “D” penalty under Item 133.


# INSPECTION PROTOCOL


## Evaluation Method



### Temperature


#### Fish counter temperature control:

 The interpretation guide requires ambient temperature checks for the fish counter (fillet area, cooked product area, whole fish area). This is not relevant because the fish counter is made of an ice bed and is not enclosed.


 Only the **product temperatures** on the counter should be measured.

#### Temperature of a product imported from abroad:

Some meat products are labelled with a storage temperature different from the one required by French regulations.  
Example: a flank steak from Ireland is labelled “to be stored between 0°C and 3°C”, while the target temperature in France is 4°C.  
Should the inspector refer to the supplier’s label or to the French temperature requirement?

 The **label takes precedence**. So in this example, the storage temperature should be considered as 0°C to 3°C.

#### **Method for evaluating the ko temperature in cases where the defrosting period is not identified**

 When the defrosting period is not identified and the zone temperature is non-compliant, the inspector must confirm the non-compliance by taking a second zone temperature measurement before probing the core to check the product temperature.

# INSPECTION PROTOCOL

## Calibration



### Calibration of Item 238 – Critical Health Alert

#### ◆ Question:

When an alert is applied due to an **accumulation of KO ratings**, should the individual KO ratings remain in addition to the alert, or should only the alert be applied?

#### ✔ Decision:

The **KO ratings are maintained in each affected section in addition to the alert.**

#### ◆ Examples:

- 1 **General refrigeration failure – KO 139 (cold chain breach)** applied in multiple sections.
- 2 **Severe pest infestation – KO 235 (massive infestation of pests)** applied in multiple sections.

📌 **Conclusion:** The **KO penalties remain active per section**, while the **alert reflects the overall critical situation.**

#### 📌 Sampling of reception self-checks

Should the reception be inspected globally at the store level when each department is responsible for its own receptions?

Two evaluation methods:

➡ In line with the evaluation method for item 213, some inspection bodies consider the most unfavourable department to calculate the 25% of missing records.  
Item 213: The deduction is calculated per unit (thus taking into account the discrepancies in the least well-controlled unit) and not based on the average of the units.  
For item 213, the records of the least well-controlled area are taken into account to estimate the percentage of missing records.

➡ Some OIs consider all activities and calculate a pro-rata since the item is in MSS and therefore covers all departments.

✔ **WG's response:** Reception must be inspected globally at the store level, but the report comment must clearly indicate which department did not perform its self-checks.

# INSPECTION PROTOCOL

## Calibration



### Calibration of Pest Item – Mites

#### ◆ Question:

Are **mites**, which naturally occur in dry-cured sausages, considered **pests** in the FSQS evaluation?

#### ◆ Examples of KO 235 (Massive Pest Infestation) Comments:

- ✓ *“Visible infestation of mites in the sausage section. The affected product is the ‘Brand’ sausage. The entire display furniture is contaminated.”*
- ✓ *“Visible infestation of mites covering all display units (including corners) for both packaged and unpackaged sausages. Mites are also found inside one packaged product.”*

#### ✓ Decision:

Even though mites are **not traditionally listed in pest control plans**, their **uncontrolled proliferation results from improper storage conditions (e.g., fluctuating temperatures, poor preservation)**.

#### 📌 Conclusion:

- If **infestation is evident**, **KO 235 is justified**.
- The presence of **mites beyond normal levels** indicates a **loss of product control**, making it a **valid health risk**.

# INSPECTION PROTOCOL

## Shelf Life Durations



### Shelf Life and Storage Temperature

#### ◆ Question:

A retailer has validated the **traditional sale of non-refrigerated products** (e.g., sandwiches, pizzas, etc.) for a specified period (**X hours**). If **products are found at ambient temperature beyond this period**, should the inspector apply:

- **Only Item 125** (Non-compliance with shelf life)?
- **Both Item 125 and Item 139** (Cold chain breach), considering that after X hours, the product should be stored at **4°C** (as required for highly perishable products)?

#### ✅ Decision:

Since **FSQS does not explicitly assign an item for this situation**, the **inspector must only apply Item 125**.

#### ◆ Key Considerations:

- **The label or recipe sheet** (for traditional sales) **must clearly indicate the validated shelf life and storage conditions**.
- There is **no requirement to apply Item 139**, as **FSQS does not mandate a default transition to refrigerated storage beyond the validated sale period**.

#### 📌 Conclusion:

The **penalty applies under Item 125** for exceeding the validated shelf life, **but not under Item 139** (unless there is explicit evidence of a cold chain breach separate from the shelf life issue).

# INSPECTION PROTOCOL

## Shelf Life Durations



### Secondary Shelf-Life Validation

A retailer has validated a secondary shelf life through a shelf-life study, extending beyond the supplier's initial shelf life for a raw material used in product fabrication.

#### Example Case:

- The finished product (e.g., Rôti Orloff) is vacuum-packed with a raw ingredient (e.g., pork fatback).
- The supplier provides a DLC (not a DUR) for the pork fatback, even though it arrives unpackaged and in bulk.
- Before its DLC expires, the fatback is cut, assembled, vacuum-sealed, and sold with a new, extended DLC.
- The retailer has validated this process nationally through an HACCP study and a full shelf-life validation as part of its PMS (Sanitary Control Plan).

◆ Question: Does this situation constitute a KO for post-dating (Item 121)?

#### ✓ Decision:

- Since the retailer has conducted an HACCP study and validated the extended shelf life through proper testing, the process is compliant.
- If the store follows the validated concept and HACCP procedures, no penalties should be applied.
- If the store does not follow the validated process, the penalty should be applied for non-compliance with HACCP protocols, not for post-dating.
- If the HACCP study or shelf-life validation is problematic, this issue should be addressed during the preparatory visit at the retailer's headquarters under the system-level shelf-life validation item.

📌 Conclusion: As long as the validated process is respected, no KO for post-dating (Item 121) should be applied. If non-compliance with the validated process is observed, the store may be penalized on HACCP-related items instead.

# INSPECTION PROTOCOL

## Shelf Life Durations



### Use of Opened Products from the Traditional Counter as Raw Materials

Some **retailers have explicitly prohibited** in their **Sanitary Control Plan (PMS)** the use of **opened products from the traditional counter as raw materials** for **store-packaged products**.

#### ◆ Question:

If this **rule is not followed**, how should it be evaluated?

#### ✅ Decision:

- The **penalty should be applied under Item 125** because **this situation extends the shelf life beyond what is validated** in the PMS.
- Since **Item 125 does not exist in the “Preparation” step**, the **penalty must be recorded in the “Self-Service Sales” step** instead.

#### ◆ Inspection Guidelines:

- The **inspector must describe the observed situation clearly in the report’s comments** to ensure the **corrective action is properly targeted**.
- The **corrective measure should focus on choosing the right raw materials, not on modifying the applied shelf life**.

#### 📌 Conclusion:

Non-compliance with the PMS rule **should be penalized under Item 125 in the Self-Service Sales step**, with a **clear description of the issue** to ensure the **correct corrective action is implemented**.



# INSPECTION PROTOCOL

## Shelf Life Durations




### **Modified Atmosphere Packaging (MAP)**

Is modified atmosphere packaging in a centralised cutting unit (UVCU) considered a technological transformation?

In this case, if the store's use-by date (DLC) is later than the DLC of the vacuum-packed raw material, would it still be considered post-dating (KO)?

### **GT Response:**

Again, this is **not** considered a technological transformation.

 The retailer may carry out an **HACCP study** and **shelf-life testing** to validate an extended shelf life beyond the supplier's date, but this information must be included in the **Food Safety Management System (PMS)** or verified if no preparatory visit has taken place.

### **Freezing of raw materials:**

How should the freezing of raw materials (initially intended for chilled storage, with a valid use-by date at the time of freezing) be evaluated when they are later used for cooking or in a preparation after the original use-by date has passed?

**Example:** A promotion on whole chicken intended for rotisserie. The store buys in bulk and gradually uses the stock over the following months to prepare roast chicken. Technically, this is not prohibited as long as it is covered by the HACCP plan.

### **Is this considered consumer deception? Is it mandatory to indicate freezing on the labeling?**

 According to service note 2007 – 168 dated August 22, 2007, three conditions must be met:

Freezing must be indicated on the label, even if the product has been cooked.

There must be no deconditioning before freezing.

The date of freezing must appear on the outer packaging.

Since the “freezing conditions” item is not included in all activities, the rating downgrade should be applied under the following items:

**210 – Identification**

**227 – HACCP**

# INSPECTION PROTOCOL

## Inspection reports



- **Preparatory Visit**

- ◆ Validation of FSQS Documents

- The validation of FSQS documents (*Interpretation Guide, Inspection Grid, FAQ*) for year N is carried out in the second half of year N-1.
  - The preparatory visit at the retail chain's headquarters may take place before year N begins.
  - The date of application for the preparatory visit must be specified in its report and must not exceed 4 months after the preparatory visit date.

- **Measurement Items & Comments**

- Each measurement item is duplicated:
  - One item where the score is applied.
  - A second item where the number of non-compliant products or equipment is recorded, along with detailed comments on the products concerned.

✓ **Requirement for Inspection Bodies** : IBs must include detailed product or equipment information in both items' comments.

- **Mandatory Inspection Report Disclaimer**

The **mandatory disclaimer** in the **inspection report** has been **modified**:

**Previous version**: "*The report may only be copied with the approval of the inspection body and the requester, and only in its entirety.*"

**Updated version**: "**The report may only be copied in its entirety.**"

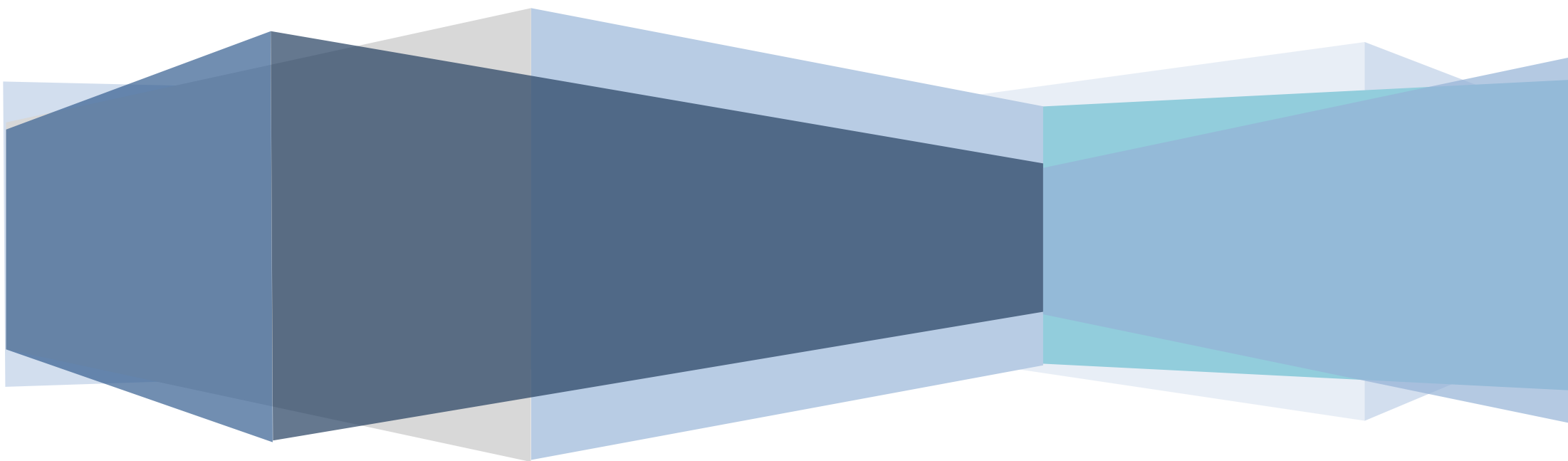
# SELECTION AND QUALIFICATION OF FSQS REFERENTS



- Experience -----
- Report Review: Case of New Inspection Bodies (OIs) -----

Slide 52

Slide 52



# SÉLECTION ET QUALIFICATION DES RÉFÉRENT.ES FSQS



- **Experience Requirements for FSQS Referents**

A **referent** must demonstrate at least **5 years of experience** in the roles of an **auditor, inspector, or hygiene consultant** in the **retail sector** (*hypermarkets, supermarkets, etc.*), focused on **consumer food safety**.

- ◆ **Evolution of Requirements:**

- Experience in the **agri-food industry** (*production and/or transformation of fresh products*) **can now be considered** for referent eligibility.
- However, this **must be complemented by at least 2 years of experience in retail (GMS)** to ensure the referent's expertise aligns with the FSQS framework.
- **New Requirement:** 5 years of experience in **either retail (GMS) or the agri-food industry**, with **at least 2 years in GMS**.

- **Report Review for New Inspection Bodies (OIs)**

The person in charge of **supervising report reviews** (*review manager*) **must be an FSQS referent** or meet the following criteria:

- ✓ **Qualified FSQS inspector for at least 2 years**
- ✓ **Completed at least 30 FSQS inspections in the past 12 months**
- ✓ **Participated in the FSQS "Referent" training**
- ✓ **Not the same person who conducted the inspection**

- ◆ **Challenges for Newly Accredited OIs:**

- Newly accredited **OIs may struggle to meet these criteria**, particularly the first two conditions.
- **Temporary Exception:** A **derogation** can be granted to **OIs accredited for less than 2 years** upon request.
- In this case, a **qualified FSQS inspector** may conduct the report reviews, with a **2-year period** to fully comply with the standard requirements.

# INSPECTION GRID ENTRY TEMPLATE



The grid used for the **2025 inspection waves** is:  
“**VERSION 3.2025 - FSQS 3 Data Entry Template 09012025**”

