

# CB Requirements in relation to Novel Coronavirus (COVID-19) – Version 2

The current epidemic of the Novel Coronavirus (COVID-19) may impact the CBs ability to complete the scheduled audits, thus potentially impacting the FSSC 22000 certification status of organizations.

In light of the recent GFSI position statement<sup>1</sup>, The Foundation has revised its statement to align with that of GFSI and harmonize the industry approach.

An exception can be applied in the case of the Coronavirus where this is preventing CBs from travelling to organizations in affected areas/countries and no auditors are available to reach the site. In all cases, the CB shall have documented procedures and keep records of the activities mentioned below as required under FSSC 22000 Scheme version 5, section 5.10 of Part 3 Requirements for the Certification Process.

**The Foundation FSSC 22000 requires its licensed CBs to undertake the following actions for certified organizations affected by the Coronavirus:**

a) Risk assessment

Follow IAF ID3:2011 *Management of Extraordinary Events or Circumstances Affecting ABs, CABs and Certified Organizations*, available at [www.iaf.nu](http://www.iaf.nu).

The Certification Body shall assess the risks of continued certification and have a documented policy and process defining the methods for evaluating the organization affected by the Coronavirus.

The documented risk assessment shall as a minimum include the criteria as listed in section 3 of IAF ID3: 2011 as well as the following:

- Key changes since the last audit e.g. HACCP plans, product recalls and significant complaint levels.
- Status with regard to objectives and key process performance, management review and internal audits. It is expected that certified organizations increase the frequency of internal audits in support of the FSMS and to ensure food safety.
- Pending compliance activities / legal proceedings
- Whether the organization is operating to the scope of certification
- Any changes to processes or services outsourced following the COVID-19 epidemic
- Emergency preparedness and response including the impact of the COVID-19 on the supply chain of the organization and the potential impact on resources and food safety.

Discussion with the organization

The aim of the discussion is to assess the site actions in response to COVID-19 and to ensure that the certified organization has developed/adjusted its procedures and operations to ensure continued compliance to the Scheme and the supply of safe products. The Certification Body shall agree appropriate times with the organization to complete a review of the risk assessment details to confirm that it is appropriate to maintain, extend certification or postpone the surveillance audit. The duration shall be appropriate to the complexity of the issues to be discussed but should be a minimum of 2 hours where there are few organization changes. It is expected that supporting documents (as appropriate) are provided as evidence for discussion.

b) Surveillance (V5 Upgrade) audits

Risk assess the situation of the certified organization and take appropriate action. This could lead to a certification decision to maintain the V4.1 certificate, suspend the V4.1 certificate or postponement of the surveillance (V5 upgrade) audit by a maximum of 6 months within the calendar

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<sup>1</sup> [https://mygfsi.com/news\\_updates/update-on-temporary-audit-measures-during-covid-19-pandemic](https://mygfsi.com/news_updates/update-on-temporary-audit-measures-during-covid-19-pandemic)

year dependent on the outcome of the risk assessment. The exception will also apply to the first surveillance audit following an initial certification.

The documented risk assessment shall be uploaded to the Portal as a “special audit” including adjusting the certificate status change (where appropriate).

c) Re-certification audits

In case the V4.1 certificate will expire, a certificate validity extension of up to 6 months is allowed following a documented risk assessment. In all cases the CB is responsible for the decision to extend the certificate validity and is required to keep records to support the certification decision.

Where the validity of the V4.1 certificate is extended, the risk assessment shall be uploaded in the Portal as a ‘special audit’ and the subsequent certification decision and extended certificate expiry date, shall be entered in the Portal at the latest 28 days after the decision has been taken. The CB may issue an extended V4.1 certificate to the organization.

The full V5 re-certification audit needs to take place within the 6 months validity extension window, with sufficient time to ensure that the extended certificate does not expire, and continuous certification is maintained. The new V5 certificate dates have to be aligned with the current certification cycle.

Example

The current FSSC 22000 certificate is valid from 18/03/2017 – 18/03/2020. Following a positive outcome on the risk assessment, the validity of the certificate can be extended by 6 months, therefore in this example the expiry date of the current certificate is extended to 18/09/2020. The full V5 recertification audit takes place in July 2020 with a certification decision date of 05/09/2020. The subsequent V5 certificate is issued that aligns back to the previous cycle, therefore with an expiry date of 18/03/2023.

d) Continual re-evaluation by the CB of the certified site’s ability to accept an on-site audit should be maintained and an audit shall be undertaken at the earliest opportunity. CB’s shall establish procedures to determine via a risk assessment the order for audit rescheduling to take place.

e) Witnessing of CB auditors

- i. *Initial auditor qualification*: for initial auditor qualification (including the transfer of already qualified approved auditors from another CB), an onsite witness audit with a positive outcome is a pre-requisite for initial qualification. In cases where the witness audit has to be delayed, the auditor qualification process cannot be completed until such time as the witness audit has taken place with a favorable outcome.
- ii. *Maintenance of auditor qualification*: every 3 years a witness audit shall be conducted for already qualified FSSC 22000 auditors: where it is not possible to schedule the witness audit within the 3 year period, the witness audit can be extended with a maximum of 6 months from the due date. The witness audit report shall clearly state that the witnessing activity was delayed as a result of the Corona pandemic and uploaded to the auditor Portal in the normal way.

f) In principle, the CB shall follow the requirements outlined in this paper, and in case this conflicts with AB requirements, the most stringent requirements shall apply. The CB shall seek approval from the Foundation to resolve any unclear issues.

g) The exceptions as listed in this position paper can be applied under the following circumstances:

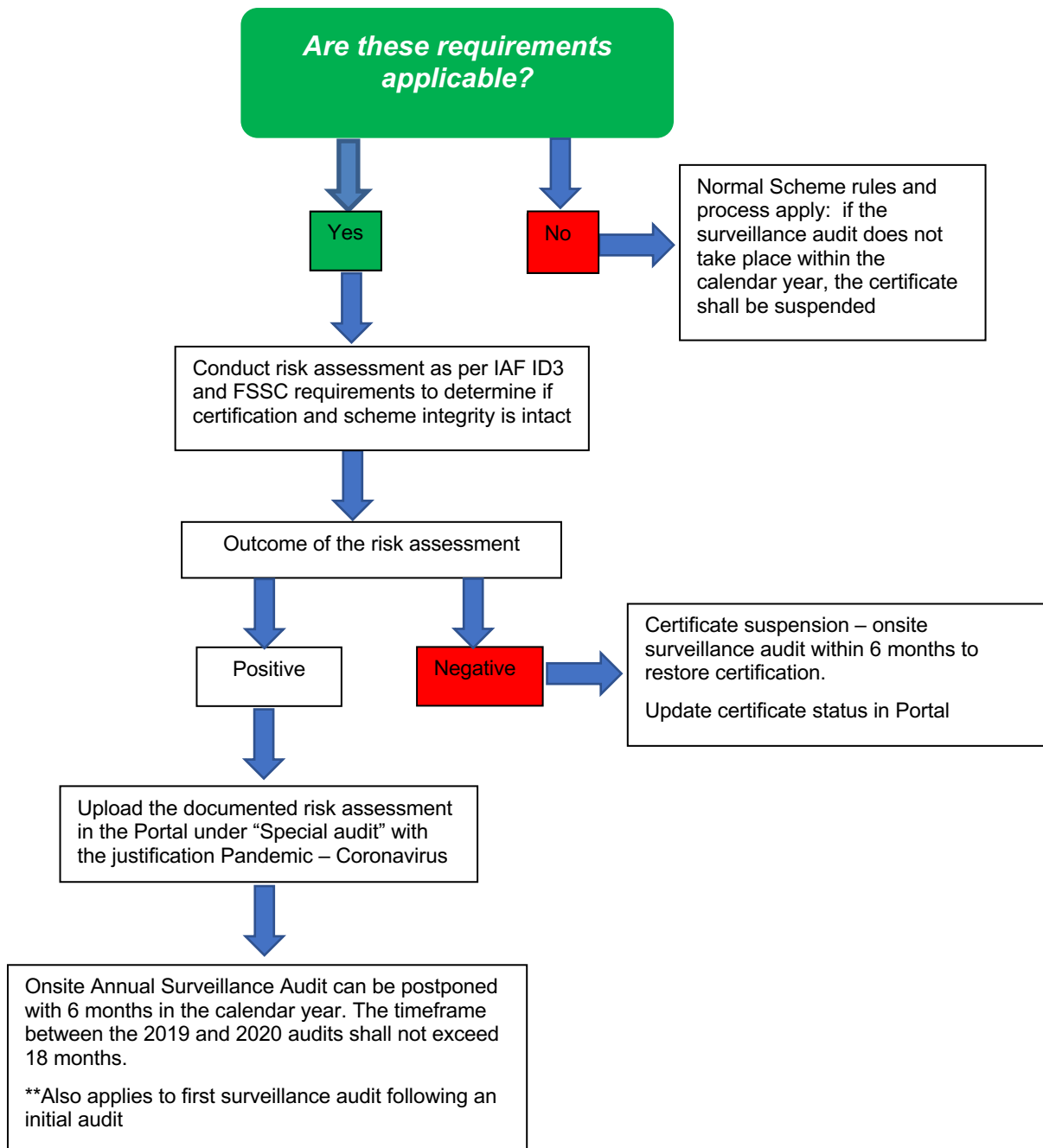
- The certified organization is situated in an area (town, city or province within a country) with known Corona cases or;
- The certified organization is in an area affected by government restrictions and/or official travel bans or;

- The certified organization's company policy is temporarily prohibiting visitors due to COVID-19 and not allowing auditors on their premises or;
- The CBs corporate policy is prohibiting auditors from travelling.

In cases where the Certified Organization's policy is prohibiting auditors from entering the site, it is expected that CBs work with these organizations to facilitate and plan the audit using the options provided. Likewise, where the CB's corporate policy is preventing auditors from travelling, all options as provided needs to be explored to facilitate audit planning and continued certification.

The cost to deliver the audit cannot be a determining factor and the exception cannot be applied to Stage 2 audits (initial certification), scope extension and follow-up audits.

## DECISION TREE FOR SURVEILLANCE (V5 UPGRADE) AUDITS



## DECISION TREE FOR V5 RECERTIFICATION AUDITS

