



FSSC 22000 Version 4

What it means for the food sector

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The Foundation FSSC 22000 launched version 4 of their global food safety certification scheme FSSC 22000 (the Scheme) in December 2016.

Version 4's most significant changes are the introduction of three new scopes for the food sector, the inclusion of unannounced audits and a greater focus on preventing food fraud. From 1 January 2018 certified organisations will be audited against the new version 4 requirements and 2017 will be a transition year.

Revisions are standard practice for the industry, with most standards and schemes being reviewed every 3-4 years to ensure that they remain in line with the evolving demands of stakeholders and shifting market dynamics. The previous version of the standard, FSSC 22000 version 3.2, was launched in 2015. The Foundation's board members believe the updates in version 4 reflect significant input from the food sector as a whole; include the latest feedback from certification and

accreditation bodies; are more aligned with Global Food Safety Initiative (GFSI) benchmarks and meet the growing expectations of governments.

More and more governments are including a 3rd party certification requirement in their mandatory food safety inspection regimes and they continue to take a keen interest in learning from how those audits are conducted. Many also have specific expectations on issues that FSSC 22000

version 3.2 did not fully cover, one of which being mandatory unannounced audits in the certification cycle, which has been included in version 4.

In general, co-operation between the public and private sectors on food safety is growing quickly, as attested to by the fact that more than 40 governments attended the GFSI Global Food Safety Conference, which took place in Houston, TX earlier this year.



New scopes for transport & storage, retail and catering

The Foundation expanded the scheme's four existing food sector scopes – farming of animals, manufacturing of food products, manufacturing of food packaging and packaging material, and the manufacturing of food and feed for animals – to seven by including transport & storage, retail and catering. The inclusion of the new scopes will bring more clarity and options to companies in those sectors, especially those that had previously wanted to be certified to FSSC 22000. Although still based on the generic ISO 22000 food safety management system standard, FSSC 22000 now offers new industry specific prerequisite programs (PRPs), which must be followed to attain certification for a specific sector.

The Foundation has seen a recent upturn in the number of FSSC 22000 certified manufacturers that are requesting other tiers in their supply chain to follow suit. Transport and storage providers are an important part of that. The GFSI already had a scope recognising the important role of the storage and distribution function in food safety practices and other schemes had already developed a standard to support companies in that area.

The Scheme defines the activities covered by the catering/food services scope as: "preparation, storage and, where appropriate, delivery of food for consumption, at the place of preparation or a satellite unit".

Its catering PRP, which uses ISO 22000 as the relevant food safety management system standard, was created by the International Organization for Standardization (ISO) as a technical specification in 2013. The PRP has been well received by the Foundation's stakeholders and it responds to growing market demand, so it was added to the Scheme's expanded portfolio of scopes covered under version 4.

The new retail scope supports companies that prepare, package, store, serve, vend, sell or otherwise provide food for consumption direct to the public. Traditionally, a small proportion of retail stores have opted for certification, but most have been audited and not certified. Since this scope was launched at the beginning of the year, however, international retailers in Europe and Asia have requested certification. The scope is seen as the logical next step for a sector of the food industry that routinely demands clear demonstrations of best practice from its suppliers.

In recognition of the considerable resources that will be required for the larger organisations to gain compliance – some may have thousands of stores located in dozens of different countries – the Scheme offers a cost-effective solution to named multiple site certification.

Auditors will be allowed to select and audit a random sample of stores – precluding the need to visit every one – provided the retailer, food service or catering organisation has a series of internal controls in place. This random sampling starts with organisations that have more than 20 sub-sites.

The introduction of critical non-conformities

In version 4, the Scheme has also tightened the definition and auditor requirements around 'critical non-conformities' that directly impact and threaten the production of safe foods or the integrity of the certificate. Auditors now have clear instructions to terminate the audit in those circumstances until the company has implemented the corrective actions that are required to address the critical shortcomings.

Previously, the classification of a critical non-conformity was a subset of 'major' non-conformity. There are still categories for major and minor non-conformities but now, instead of being a subset of 'major', 'criticals' are isolated and require strict responses from auditees. Another revision is the elimination of 'observations', essentially recommendations for good practice or relatively informal hints on how an organisation may improve its food safety management practice.

After an analysis of the non-conformities written by auditors, the Foundation found substantial differentiation in responses that needed to be addressed in order to encourage common standards across cultures. In some cultures, the reporting of major non-conformities was very uncommon, especially against, for example, senior management's commitment to the established food safety plan. The preference was for writing observations instead of non-conformities. In other cultures, where critiques of senior management are more socially acceptable, the number of written non-conformities could dominate observations. The new global framework will encourage consistency with regard to the assessment of non-conformity in the food industry.

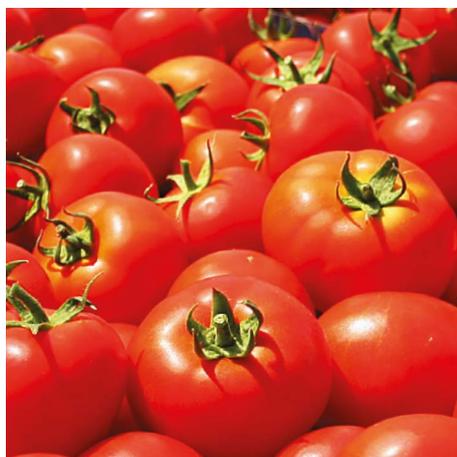
Separately, version 4 has also mandated auditor rotation: auditors will no longer be allowed to audit the same organisation for more than two consecutive three-year certification cycles.

Unannounced Audit

For most in the industry, the major impact of the revisions in version 4 will be related to the introduction of mandatory unannounced auditing and the new demands aimed at combating food fraud. The new rules requiring unannounced audits have been adopted to make the assurance process more robust through reducing predictability and fostering audit readiness at any time. They are also driven by the demands of governments, which routinely utilise unannounced audits for their own legal compliance inspections, and by the GFSI, which favours this new concept. In general, their inclusion will further enhance the credibility of the Scheme and support food safety.

The standard certification cycle includes annual surveillance audits. The Scheme now mandates that at least one of those will be conducted in a truly unannounced manner. While the specific surveillance audit is chosen by the certification body (CB), the organisation being audited has the option to request more than one unannounced audit.

The practical application of unannounced audits will definitely be a challenge in some countries, especially those that lack a qualified auditor pool. For example, auditors are often required to fly into countries that lack domestic resources, and they require visas to do so. The applications for those visas can require a supporting 'letter of invitation' from the company being audited. There may be other practical problems, such as the availability of the specific subject matter experts the auditor may want to interview. The company can indicate blackout periods, which are defined as "Time periods shared by the applicant/certified organisation with the certification body that prevents the unannounced audit occurring when the organisation is not operating for legitimate business reasons." For example, if sites have regular maintenance schedules or religious observances, the auditor will need to be notified in order to not waste time and resources. Auditors will also look to ensure that factories were indeed closed during the agreed blackout periods.



The Scheme expects sites to be audit-ready, given the calibre of the organisations that achieve FSSC 22000 certification, so it is unlikely that the unannounced audit mandate will result in an increase of 'critical non-conformities' being written.

Food Fraud Prevention

Perhaps the biggest challenge for all companies will be meeting version 4's new food fraud prevention requirements. Aligned with GFSI, the revised Scheme requires a separate food fraud vulnerability assessment and prevention strategy for the most significant potential fraud acts related to products handled by a specific industry sector. This will require considerable communal capacity building from organisations and the auditing community because the industry does not yet have an official blueprint for conducting a vulnerability assessment for food fraud, given the disparity of the products and the environments in which they are produced. There are some basic assessment methods that define focus, such as separating the internal and external conditions for food fraud occurring.

Preventive measures for the external conditions usually focus on the incoming raw materials, which can be of lower quality or infected with contaminants such as melamine. Looking for ways to shorten the food supply chain can prove effective in reducing fraud: the longer the supply chain, the greater the risk of introducing companies and people who may be economically motivated. Market conditions can also alert the supply chain owner to a greater potential for food fraud. If a harvest of raw materials is bad, the price for that material goes up, increasing reward, and temptation.

When looking for effective internal preventive measures, the purchasing department is a good place to start.

If purchasing managers are receiving significant bonuses for negotiating low prices, they have an incentive to opt for lower quality materials, and the motivation can be created for suppliers to substitute. As the industry looks to build the capacity to prevent food fraud, it will be important to recognise that global CBs such as LRQA have the resources and expertise to help assess any organisation's unique vulnerabilities.

How are FSSC 22000 version 4 and FSMA aligned?

The Foundation has used the same legal group that helped to write the US FDA's Food Safety Modernization Act (FSMA) to help compare the requirements. The Foundation is currently finalising a line-by-line comparison, but the initial high level comparison shows that the Scheme essentially meets the intent of FSMA. However, the FSMA rules have some very detailed requirements around areas such as record keeping, whereas the Scheme leaves that relatively open. So the Foundation is identifying the gaps and will produce a module to the Scheme that will help organisations to understand which clauses in the Scheme match the requirements in FSMA and the additional level of detail that needs to be included into their procedures and work instructions. The Foundation does not intend to have CBs issue a certificate of FSMA compliance, but instead this tool will help organisations to understand what is required.

Time to prepare for the new requirements

The best starting point is to read in detail what version 4 entails and to become familiar with it – particularly part 2, the requirements for certification. The biggest challenge for all companies is likely to be meeting the new food fraud prevention requirements, so the food fraud vulnerability assessment and prevention strategy should be a key focus area.

FSSC 22000 is a demanding Scheme that demonstrates that you have a mature FSMS. Preparing for FSSC 22000 certification requires company-wide commitment and effort, but the pay-off in terms of best-in-class food safety management and stakeholder confidence in the organisation's food safety management system, justifies the investment.

About LRQA

LRQA is a recognised, world leading professional assurance services organisation. We specialise in management systems compliance and expert advice across a broad spectrum of standards, schemes and business improvement services including customised training and assurance programmes. We are recognised by almost 50 accreditation bodies and deliver our services to clients in more than 120 countries.

Our unique assessment methodology takes your management systems from compliance to performance, in order to reduce business risk, and enhance the effectiveness, efficiency, and continuous improvement of your management systems.

LRQA is part of the Lloyd's Register Group and at our heart sits a charity, the LR Foundation. Most organisations do something to make money but at Lloyd's Register, we make money to do something. As a percentage of our profits go towards the LR Foundation, every time you choose LRQA, not only are you getting best-in-class professional assurance services, but you are helping to make a difference to our world.

About FSSC 22000

The FSSC 22000 Food Safety System Certification provides a framework for effectively managing food safety and quality responsibilities. It demonstrates that a company has a robust and effective food safety management system (FSMS) in place to meet the requirements of regulators, food business clients and consumers.

The FSSC 22000 Scheme is managed by the independent Foundation FSSC 22000. It is recognised by the Global Food Safety Initiative (GFSI) and was developed in response to the needs of the international food sector. FSSC 22000 is fully based on the international, independent standards: ISO 22000 and ISO 22003, with sector specific technical specifications for Prerequisite Programs (PRPs) and additional Scheme requirements. For more information visit www.fssc22000.com



Remco Pieters
Technical Manager
Food at LRQA

Remco Pieters is Technical Manager Food at LRQA and has over 20 years' experience in the quality assurance arena. He is currently responsible for the development of food safety programmes in the Northern Europe region and is a global product specialist in ISO 22000, FSSC 22000, Dutch HACCP and EFISC.

Prior to moving to LRQA, Remco held various quality management positions within Lamb Weston Meijer and Bakkersland. He holds a bachelor's degree in Food Technology and Processing from HAS University of Applied Sciences, and a Master's degree in Agricultural Economics from Wageningen University.



Aldin Hilbrands
Technical Director
at FSSC 22000

Throughout the past 20 years, Aldin has worked in various positions ranging from consultancy, training and quality assurance to managing brand integrity with regard to legality, safety and sustainability.

He is currently responsible for all technical FSSC 22000 scheme requirements and is a member of the FSSC 22000 management board.

Prior to this, he worked for Royal Ahold in a global role, and was responsible for policy setting and compliance of own brand products with food safety, non-food safety, social compliance and responsible seafood requirements. This entailed intensive internal and external engagement with various stakeholders such as standard setting organisations,

certification and accreditation bodies, trade organisations, governments, NGO's, etc.

He has served in many different capacities on boards and working groups of leading organisations such as the Global Food Safety Initiative (GFSI), Global Social Compliance Program (GSCP), Business Social Compliance Initiative (BSCI), Marine Stewardship Council (MSC), Aquaculture Stewardship Council (ASC) and most recently he co-founded the Global Seafood Sustainability Initiative (GSSI).

For more information on FSSC 22000, email enquiries@lrqa.com or visit www.lrqa.com/food-safety

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