

CB REQUIREMENTS IN RELATION TO MANAGING THE NOVEL CORONAVIRUS (COVID-19) PANDEMIC

Date – December 2020

Change details

- Allowances for surveillance audits
- Risk assessment application
- Audit delivery methods
- Clarification on continuous audit requirements

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

Following discussions internally and with other Stakeholders, the Foundation FSSC 22000 has decided to grant further exceptions in the following cases:

- The certified organization is situated in an area (town, city, or province within a country) with known Corona cases;
- The certified organization is in an area affected by government restrictions and/or official travel bans;
- The certified organization's policy is prohibiting visitors due to COVID-19 and not allowing auditors on their premises;
- The CB policy is prohibiting auditors from travelling.

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. If 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, when 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.

THE FOUNDATION FSSC 22000 REQUIRES ITS LICENSED CBS TO UNDERTAKE THE FOLLOWING ACTIONS:

a) Risk assessment

Follow IAF ID3:2011 *Management of Extraordinary Events or Circumstances Affecting ABs, CABs, and Certified Organizations*, available at 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 organizations 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 parameters (OPRPs, CCPs), 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 within the scope of certification.
- Any changes to processes or services outsourced as a result of the COVID-19 pandemic and
- Emergency preparedness and response including the impact of COVID-19 on the supply chain of the organization and the potential impact on resources and food safety.

Refer to the FAQ and Guidance Document in MyFSSC for more information on conducting risk assessments and the requirements linked to the Integrity Program desk reviews.

b) 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 as appropriate, to ensure continued compliance to the Scheme and the supply of safe products. The CB shall agree appropriate times with the organization to maintain, extend certification or postpone the audit. The duration shall be appropriate to the complexity of the organization, with a minimum duration of 2 hours when there are few organizational changes. Appropriate supporting documentation shall be provided as evidence of the discussion and the discussion duration (time) and CB decision shall be recorded in the risk assessment.

Where the outcome of the risk assessment is positive and the risk of maintaining certification is low, the CB may decide to justify postponing the surveillance audit or grant one 6-month certificate validity extension if the certificate is about to expire. When the risk assessment outcome is negative or the risk of maintaining certification is high, the certificate shall be suspended.

c) Surveillance audits

The following options are available to CBs and certified organizations

- Surveillance audits due in 2020 may be postponed within the calendar year or the general concession (BoS decision #21) could be applied in which case the audit shall be completed at the latest by 31 March 2021. The postponed surveillance audit may be conducted as a full on-site audit, as a two-part process (remote+ on-site as per Annex 9) or as a full remote audit. In the case of a first surveillance audit following an initial audit, the time between the two audits shall not exceed 18 months (refer IAF ID3), otherwise the certificate shall be suspended.
- Where the surveillance audit is conducted as a two-part process (remote and on-site) the requirements as set out in Annex 9 applies.
- Where the surveillance audit is conducted as a full remote audit because the site cannot be accessed as a direct result of COVID-19, the requirements in the Full Remote Audit Addendum apply. The full remote audit option is currently not covered under the GFSI recognition of the Scheme, but it is covered by accredited Scheme certification and endorsed by IAF.

d) V5 Re-certification audits

- In case the V4.1 certificate will expire; a validity extension of maximum 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.

- The re-certification audit may be conducted as a full on-site audit, as a two-part process (remote and on-site as per Annex 9) or as a full remote audit. The recertification 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. Please note that no V4.1 certificates will be valid after 30 June 2021.

e) Risk assessments

Where risk assessments have been completed previously related to the serious event (COVID-19), this risk assessment may be used as the risk assessment required for the ICT Audit Approach (Annex 9) or Full Remote audit, subject to the CB reviewing the risk assessment to ensure it is still relevant and meets the requirements as set out in Annex 9 or the Full Remote Audit Addendum as applicable. The ICT requirements shall also be reviewed to ensure it is fit for purpose to deliver an effective audit that meets the audit objectives.

f) Audit Delivery methods

- As an exception during the Corona pandemic, it is possible to switch from the ICT Audit Approach to the Full Remote Audit option when the site cannot be accessed. For example, when an organization has already started with the ICT Audit approach and have completed the remote component of the audit, it is possible to convert the on-site audit component of the ICT Audit Approach to a remote audit whilst still meeting the 90-calendar day requirement to complete the full audit. The audit will then be classified as a full remote audit and the CB shall communicate to the certified organization that the full remote audit option is not GFSI recognized. The certificate and the portal shall be updated accordingly.
- In exceptional cases where the CB has conducted the majority of the audit as a full on-site audit but was unable to finish the audit as a result of Corona, then a follow-up audit is required by the Scheme, to be completed as soon as possible but not exceeding 30 calendar days.
- When an organization opts for the full remote audit as set out in the Addendum, the audit shall be completed in a set timeline and follow the same principle as the full on-site audit. The audit is required to be a continuous audit from start to finish allowing for some breaks when required, for example over weekends, due to public holidays or to account for the ICT used. Continuous is considered to mean completing the audit within a maximum of 7 calendar days.
- An overview of the different audit delivery methods is available [here](#).

g) Ongoing Assessment

Continual re-evaluation by the CB of the certified organization's ability to accept an audit shall be maintained and an audit shall be undertaken at the earliest opportunity. CB's shall establish procedures to determine the order for audit rescheduling to take place.

h) Witnessing of CB auditors

- *Initial auditor qualification:* for initial auditor qualification 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.
- *Maintenance of auditor qualification:* every 3 years a witness audit shall be conducted for already qualified FSSC 22000 auditors. When it is not possible to schedule the witness audit within the 3-year period, the witness audit may be postponed 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 database in the normal way. The postponed witness audit may also be conducted as a remote witness when the CB deems the risk to be low.

- *Already qualified FSSC 22000 auditors moving from another CB* are still required to have a witness audit by the new CB as part of the approval process, but this witness audit may, at the discretion of the CB, be conducted as a remote witness.
 - *Conducting remote witness audits* of partly remote (ICT Audit Approach) or full remote audits are allowed when the ICT is suitable to ensure an effective witness audit meeting the witness audit objectives and covering the full audit.
- i) 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.