

# NON-FOOD PACKAGING MODULE (HPC 420) POSITION STATEMENT - STANDALONE AUDITS

01 November 2021

The following process has been approved by the Management Board of the Foundation FSSC and is effective as of 01 November 2021. The position statement allows for an exemption to the normal process and shall only be applied under the conditions set in this document.

## 1 INTRODUCTION

The Foundation has developed a Non-food packaging Module (HPC 420) that may be used in combination with FSSC 22000 packaging and ISO 9001. The Module is available on the HPC 420 website ([www.hpc420.com](http://www.hpc420.com)) or the FSSC website ([www.fssc22000.com](http://www.fssc22000.com)) under Scheme Addenda.

With this combination, a packaging manufacturer's food and non-food packaging manufacturing process is FSSC audited and certified as part of one process. The Module is designed to address specific differences, but also with the principle of looking at the overlaps in a holistic manner during the integrated audit. This holistic overview is lost when auditing the Module in isolation, and some key aspects might not be covered/addressed in sufficient detail.

To accommodate a commercial need in the packaging industry, the Foundation allows a stand-alone non-food packaging Module audit for organizations that start with the non-food packaging Module (HPC 420) under this exemption.

## 2 EXEMPTION: STAND-ALONE AUDIT AGAINST THE NON-FOOD PACKAGING MODULE

### 2.1 APPLICABILITY

By exemption, it is allowed to conduct a stand-alone audit against the non-food packaging module for:

1. An organization wishing to extend its existing FSSC 22000 packaging certification with the Non-food packaging Module.
2. An organization that transfers its FSSC 22000 packaging certification to another CB that offers certification against the Non-food packaging Module.

## 2.2 ADDITIONAL REQUIREMENTS

### 2.2.1 EXTENDING THE EXISTING CERTIFICATION WITH THE NON-FOOD PACKAGING MODULE

A stand-alone non-food packaging audit and certification (module) is allowed under the following conditions:

1. The organization is a food and non-food packaging manufacturer.
2. The organization holds a valid FSSC-Q (or FSSC 22000 packaging and ISO 9001 certificate) that covers the food packaging manufacturing process.
3. The last scheduled FSSC 22000/ISO 9001 audit was not more than nine (9) months ago.
4. The organization may only conduct the stand-alone audit once (to add the Module to the existing certification) , and thereafter all audits shall be integrated.
5. The validity of the Non-food packaging Module certificate shall be aligned with that of the FSSC certificate.

Preferably the same auditor who conducted the FSSC-Q audit (or FSSC 22000 packaging and ISO 9001 audit) should conduct the add-on audit of the Module, or the CB needs to make the report available to the other auditor and have a process/procedure to deal with this.

### 2.2.2 TRANSFER OF CERTIFICATION

The standalone non-food packaging (HPC 420) audit may be conducted by another (new) CB that has not conducted the previous FSSC-Q audit (or FSSC 22000 packaging and ISO 9001 audit). This is only allowed after the FSSC-Q certificate (or FSSC 22000 packaging and ISO 9001 certificates) has been successfully transferred to the new certification body and the corresponding licensing is in place with the Foundation.

The Foundation shall be informed where this exemption is being applied in a timely manner and the data uploaded in the Portal.