



# FOOD SAFETY SYSTEM CERTIFICATION 22000

## COSTCO SPECIFIC FOOD SAFETY REQUIREMENTS MODULE



Version 2.1 | May 2023

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## TRANSLATIONS

Please note that in the case of translations of this Module, the English version is the valid and binding version.

## REVISION HISTORY

Date Published	Issue	Changes
July 2022	1	First publication
April 2023	2	Updates made to align with Costco Wholesale: Food Safety & Quality Audit Expectations for Costco Suppliers Version 2.0. The main changes include: <ul style="list-style-type: none"><li>• Section 4.5: Unannounced audits</li><li>• Section 6: Costco-Specific Audit Requirements:<ul style="list-style-type: none"><li>◦ Updated CSAR 1 to 6</li><li>◦ Added CSAR 7 to 12</li></ul></li></ul>
May 2023	2.1	Updated the requirements for: <ul style="list-style-type: none"><li>• Section 4.5 - Unannounced Audits,</li><li>• Section 4.6 - Audit Report, and</li><li>• Section 4.9 - Assurance Platform Data and Documentation</li><li>• Annex A</li></ul>

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## 1. PURPOSE

This document describes the additional requirements for organizations certified to FSSC 22000 to meet those specified in the Costco Wholesale Food Safety Audit Expectations document, as well as the process for Certification Bodies to follow when conducting audits to this Module. This Module can only be delivered when combined with an FSSC 22000 audit. It is necessary for the supplier to fully meet the requirements of both FSSC 22000 and the specific requirements within this document.

## 2. INTRODUCTION

It is required that all FSSC 22000 certified sites have a customer focus process in place to maintain knowledge of customer expectations and to meet those expectations wherever possible.

Previously Costco Wholesale has required FSSC 22000 certified suppliers to have the Costco GFSI Addendum completed during their FSSC 22000 certification audit. The additional Costco Specific requirements within the Costco GFSI Addendum were recorded separately from the FSSC 22000 report.

Costco, in collaboration with FSSC 22000 stakeholders, has decided that a Module to show where Costco Specific requirements differ from those of FSSC 22000 could replace the need for the full Costco GFSI Addendum and would be of value to show how the Costco - Specific requirements should be verified during an FSSC 22000 Assessment without the need for a separate audit report.

Depending on the product and technology, an adjustment of audit duration can be agreed upon between the certified/to be certified organization and the responsible Certification Body.

## 3. SCOPE

This module is a voluntary document that applies to organizations wishing to meet the requirements of the Costco Wholesale Food Safety Audit Expectations document.

This module is applicable to:

1. All sites that manufacture, process, and pack food for Costco Wholesale,
2. Processed foods, both own-brand and customer-branded,
3. Raw materials or ingredients for use by food service companies, catering companies and/or food manufacturers, and
4. Primary products such as fruit and vegetables.

Scope exclusions: Where the Costco module is requested, the scope shall include all the applicable products and processes on site. It is not possible to select Costco products or processes to be excluded from the scope of certification.



The additional requirements specified in this document are based on a GAP analysis between FSSC 22000 and the Costco Wholesale Food Safety Audit Expectations document. Meeting the additional requirements in this Module, in addition to the FSSC 22000 requirements, results in compliance with the Costco Wholesale Food Safety Audit Expectations document.

This document also sets out the auditing and certification process requirements for FSSC 22000 licensed Certification Bodies (CBs) wanting to audit this Module.

## **4. REQUIREMENTS FOR THE CERTIFICATION PROCESS**

This section sets out the requirements for the certification process and applies to both organizations and FSSC 22000 licensed CBs as relevant.

The CB shall have procedures for including the Module in the FSSC 22000 audit process and apply the Module under the same principles as FSSC 22000.

This module may only be delivered by certification bodies that are recognized by Costco Wholesale and licensed with the Foundation to deliver FSSC 22000 audits. Costco suppliers must notify their certification body that they need to undertake this Module audit going forward.

This Module may only be carried out together with an FSSC 22000 audit with a corresponding scope and may not be delivered as a stand-alone module. The certified organization (supplier) must notify the certification body in advance that they want to undertake this Module so that additional audit duration may be determined prior to the commencement of the audit.

The scope must include all Costco Wholesale products and production facilities. The certified organization (supplier) and certification body must agree to the scope of certification prior to the audit.

### **4.1 CONTRACT AND APPLICATION PROCESS**

The organization shall inform the CB that they wish to include the Module as part of their FSSC 22000 audit prior to the start of the audit. The CBs application system shall allow for this information to be captured, including the scope, and the contract with the organization shall be updated to include the Module.

### **4.2 AUDIT DURATION**

The CB shall determine the additional audit duration needed to assess the Module requirements based on the size and complexity of the organization.

The minimum audit duration shall not be less than 1 to 2 hours in all cases and does not include planning, reporting, or travel activities, and only relates to effective time spent auditing the Module.

### **4.3 ALLOCATION OF THE AUDIT TEAM**

The audit to the Module shall be conducted by an FSSC 22000 qualified auditor for the relevant category, and the auditor must meet the requirements as defined under section 5 below.

### **4.4 AUDIT PROCESS**

The Module audit is always a full audit covering all the requirements listed in Part 6 of this document and is to be assessed as an integrated part of the FSSC 22000 audit.

The audit program and audit plan shall clearly reference and include the Module requirements.

The combined audit shall be conducted annually as part of the FSSC 22000 audit. The first audit of the Module can take place at any full FSSC 22000 audit during the cycle (initial, surveillance, or recertification).

The audit delivery method (on-site, ICT Audit approach, or full remote) shall be aligned to that of the FSSC 22000 audit and follow the same requirements.

### **4.5 UNANNOUNCED AUDITS**

It is a mandatory requirement from Costco that all audits accepted by Costco shall be delivered unannounced where allowed by the Scheme. Therefore, it is mandatory for FSSC 22000 surveillance and recertification audits to be delivered as unannounced where the FSSC Costco Module is delivered, as the Scheme allows both surveillance audits and recertification audits to be delivered as unannounced audits if agreed with the organization (refer to Part 3, Section 5.4 of the Scheme). The initial audit (stage 1 and stage 2) shall not be delivered as unannounced. The Scheme requirements still need to be met, and therefore, the certified organization needs to agree to all surveillance and recertification audits being delivered as unannounced audits.

If the certified organizations do not agree to this requirement, then they cannot undertake the FSSC Costco Module in conjunction with the FSSC 22000 audit and can only undertake FSSC 22000 certification. Standalone audits against the FSSC Costco Module are not allowed.

Certified organizations that do not want to undertake an unannounced FSSC 22000 and FSSC Costco Module combined audit each year and intend to stay in compliance with Costco can complete a separate unannounced Costco Food Safety audit. The separate Costco Food Safety audit shall be completed in the calendar year that the FSSC 22000 announced audit is delivered, and the audit duration for this separate Costco Food Safety audit is as per Costco requirements. The separate Costco Food Safety audit does not need to be completed during the year that the FSSC audit falls into the unannounced cycle if the FSSC Costco Module is audited together with the FSSC unannounced audit.

Note that the separate Costco Food Safety audit is managed by Costco and not a module or addendum offered by the Foundation. Please contact your Costco Food Safety Contact/Representative if you require details on the separate Costco Food Safety audit.

### **4.6 AUDIT REPORT**

The CB shall provide a separate written report for each audit to the Module. The report may be customized by the CB but shall include sufficient objective evidence to confirm that all the requirements in the Module have been assessed, including a summary of the nonconformities

raised (where relevant) and meeting the requirements of Annex A of this document. It shall be referenced in the “Audit Details” section of the FSSC 22000 audit report that the Costco Module was combined with the FSSC 22000 audit.

In addition to meeting the requirements of Section 4.9 of this Module, relating to uploading the FSSC Costco Module to the FSSC Assurance Platform, the CB shall also upload a copy of the FSSC 22000 audit report and related FSSC Costco Module report to the Costco audit platform.

The FSSC 22000 audit report and FSSC Costco Module report shall be placed in a ZIP folder before uploading to the Costco audit platform.

## **4.7 NONCONFORMITY MANAGEMENT**

The same criteria, as defined in the FSSC 22000 Scheme, applies to any nonconformities identified against the specific requirements of the Costco Module, including grading, timelines, and follow-up actions.

Where a systemic failure to meet the customer requirements of this Module is identified, a nonconformity shall also be raised against the relevant clause of FSSC 22000 in addition to the relevant Costco clause.

## **4.8 CERTIFICATION DECISION PROCESS**

The CB shall conduct a technical review and undertake a certification decision for all audits against the Module, in conjunction with the review of the FSSC 22000 audit, to agree with the audit report content and outcome, NCs (objective evidence and grading), and effectiveness of corrections and corrective action plans. A positive certification decision for the FSSC 22000 audit is a prerequisite for achieving conformance to this Module.

It remains the responsibility of the CB to ensure a proper and robust audit and certification process.

## **4.9 ASSURANCE PLATFORM DATA AND DOCUMENTATION**

The Module report shall be uploaded to the FSSC Assurance Platform, together with the FSSC 22000 related audit, within 2 months of the last day of the audit. In addition, the CB shall indicate in the Assurance Platform, under the Addendum section of the relevant audit, that the Costco module was included as part of the FSSC 22000 audit. The same requirements relating to Data Quality, as set out in FSSC 22000, apply.

# **5. REQUIREMENTS FOR CERTIFICATION BODIES**

## **5.1 COMPETENCE**

The CB shall follow the same requirements described in Annex C of ISO/TS 22003 for defining the competencies required to conduct the audit and certification activities.

Records of training shall be maintained by the CB.

### 5.1.1 AUDITOR REQUIREMENTS

Only FSSC 22000 auditors with the relevant category approval may conduct audits to the Module. The auditor shall receive specific training on the requirements of the Module prior to conducting any audits. Records of the training shall be maintained and uploaded in the FSSC Auditor register, under the maintenance tab, prior to commencing with Module audits.

The CB may define additional competency requirements in line with their procedures or accreditation requirements. A specific witness audit to the Module is not a requirement, but where an auditor does have approval to audit to the Module, the CB shall include it as a parameter when assigning witness audits as well as a specific element in the 3-yearly auditor performance review.

## 6. COSTCO SPECIFIC AUDIT REQUIREMENTS

Costco Specific Audit Requirement (CSAR)	Costco Specific Food Safety Requirements
CSAR 1	<b>Pest Control</b> <p>The program must be administered by a licensed pest control operator, and include a scheduled frequency of services, as well as a map showing the location and type of all pest control devices. The map must be updated as needed but at least annually.</p>
CSAR 2	<b>Supplier Approval</b> <p>Operations must have a Supplier Approval Program in place to monitor and evaluate all raw material (including primary packaging) suppliers. In addition to FSSC requirements, the Supplier Approval Program shall at a minimum include:</p> <ul style="list-style-type: none"> <li>• A current list of all raw material (including primary packaging) suppliers, including growers and harvest crews where applicable.</li> <li>• Where there are label claims such as "organic", "Gluten Free", "non-GMO", "no antibiotics", "raised without antibiotics", "no hormones added", or "no hormones administered" the operation must validate these through any combination of testing, certifications, or audits.</li> <li>• Requirements for raw material (excluding food contact packaging) suppliers to be operating under a food safety management system. The system shall meet all applicable regulatory requirements.</li> <li>• Requirements for food contact packaging suppliers to be operating under a quality management system and a risk-based control plan. The system shall meet all applicable regulatory and customer requirements.</li> <li>• A requirement for raw materials suppliers, including primary packaging to be audited by a third party to a standard that verifies implementation of GMP/GDP/GAP, HACCP / Preventive Controls / HARA, a traceability system, and a recall management plan. The requirements shall have pass/fail criteria defined for the supplier's audits to maintain approved status.</li> </ul>



Costco Specific Audit Requirement (CSAR)	Costco Specific Food Safety Requirements
	<ul style="list-style-type: none"> <li>• Annual verification of the supplier's audit.</li> </ul>
<b>CSAR 3</b>	<p><b>Hand Wash Stations</b></p> <p>Hand wash stations are appropriately located in the processing areas and include the following:</p> <ul style="list-style-type: none"> <li>• Hands-free water and towel operations (single-use or similar drying services),</li> <li>• Liquid soap,</li> <li>• Warm water (within 15 seconds), and</li> <li>• Signage in languages appropriate for employees to understand.</li> </ul>
<b>CSAR 4</b>	<p><b>Glove Use</b></p> <p>Costco has a "No Bare Hands" policy i.e., gloves must be used where there is direct hand contact with ready-to-eat products regardless of the risk level.</p> <p>Below are the additional Costco requirements for glove use:</p> <ul style="list-style-type: none"> <li>• The facility must have a written procedure for the proper handling and usage of gloves and must include verification documentation.</li> <li>• Reusable food-safe gloves must be washed and sanitized frequently – at a minimum, at the start, after breaks, and after handling potential contaminants.</li> <li>• If fabric gloves are used when hands are in contact with food, they need to be covered with an outer non-latex, powder-free disposable glove.</li> <li>• All other types of gloves are to be latex-free and powder-free.</li> <li>• All gloves should always be clean and in good condition.</li> </ul>

Costco Specific Audit Requirement (CSAR)	Costco Specific Food Safety Requirements
<b>CSAR 5</b>	<p><b>Traceability</b></p> <ul style="list-style-type: none"> <li>• Costco requires that suppliers show that traceability exercises were conducted independently at least twice during the year.</li> <li>• The system must be able to account for 100% of the product in a 2-hour timeframe.</li> <li>• Site must show that they have conducted separate trace exercises for two of the three areas defined in the Costco requirements:             <ul style="list-style-type: none"> <li>○ Finished goods</li> <li>○ Raw material/ingredients</li> <li>○ Primary packaging</li> </ul> </li> <li>• The third area should be the subject of the onsite auditor-initiated trace exercise.</li> <li>• Each exercise must be completed within a 2-hour limit and account for 100% of the selected sample.</li> </ul>
<b>CSAR 6</b>	<p><b>Foreign Material Control</b></p> <p>Operations must have a comprehensive foreign material control plan in place for known and reasonably foreseeable physical hazard. In addition to FSSC requirements the foreign material control plan at a minimum must include:</p> <ul style="list-style-type: none"> <li>• A glass and brittle plastic policy which maintains a map of glass and brittle plastic in product zones and areas, verified at a defined frequency.</li> <li>• A policy that restricts the use of materials in product zones and areas that are not easily cleanable or prone to creating foreign material contamination. These materials include – but are not limited to - foam rubber, any type of carpet, wood, non-food grade plastic, cardboard, tape, etc. Clothes, towels, and other cleaning materials that pose a risk of contamination or adulteration shall not be used to remove dirt and debris from products. Workers must not handle products in a manner that results in contamination or adulteration.</li> <li>• A mechanism for employees to report concerns that includes specific language for foreign material contamination.</li> <li>• Annual training on foreign material hazards for all employees at the facility, including instruction on the mechanism employees can use to report concerns.</li> </ul>

Costco Specific Audit Requirement (CSAR)	Costco Specific Food Safety Requirements
CSAR 7	<p data-bbox="496 315 868 344"><b>Detection of foreign objects</b></p> <p data-bbox="496 387 1399 490">All manufacturing operations must have a properly installed and calibrated X-ray detection device for finished product, except in the following circumstances:</p> <ul data-bbox="496 495 1399 1070" style="list-style-type: none"> <li>• Product texture, density, or chemical composition is such that it limits the performance of the X-ray technology to an unacceptable level. These operations will be required to have a metal detector installed as well as a letter from a subject matter expert confirming that X-ray is not applicable.</li> <li>• Shell Eggs, whole raw agricultural commodities, whole roasted coffee beans, whole muscle meats, and packaging products will be exempt from the X-ray requirement. The operation will need to maintain current good manufacturing practices and prerequisite programs to mitigate foreign material contamination.</li> <li>• Operations that utilize a physical barrier (e.g., screen, filter, sieve) that is appropriately sized and placed will be exempt from the X-ray device requirement. The operation will need to conduct integrity checks at a defined frequency and maintain current good manufacturing practices and prerequisite programs to mitigate foreign material contamination.</li> </ul> <p data-bbox="496 1113 1399 1252">All X-ray and metal detection devices must have a proper rejection mechanism to segregate rejected products. Rejected products must be physically controlled and have access restricted until evaluation by designated personnel can be completed.</p> <p data-bbox="496 1294 1399 1359">Operations must perform documented X-ray and metal detector challenges at a defined frequency, but at a minimum:</p> <ul data-bbox="544 1364 1254 1541" style="list-style-type: none"> <li>• At the start and finish of daily production/shift.</li> <li>• At <math>\leq 2</math> (two) hour intervals during the production run.</li> <li>• When changes in production batches occur.</li> <li>• When changes in machine settings occur.</li> <li>• After downtime for repairs.</li> </ul> <p data-bbox="496 1583 1399 1832">Challenge materials must conform to the manufacturer's recommendations (e.g., metal, glass, plastic, wood, etc.) and reflect the known and likely contaminants of the product and production process. Where metal detection is deployed, Ferrous, Non-Ferrous, and Stainless-Steel test pieces must be used. Facilities that have not installed a detection device by the time of their Costco Module audit will receive an automatic audit failure for the Costco Module.</p>

Costco Specific Audit Requirement (CSAR)	Costco Specific Food Safety Requirements
<b>CSAR 8</b>	<p><b>Handling of potentially unsafe products</b></p> <p>For products subject to the Costco Test and Hold Program, all product lots must remain within the supplier's control until satisfactory test results are obtained. Additionally, all finished product lots that undergo pathogen testing voluntarily, at buyer's request, as required in product specifications, or due to regulatory requirements must remain within the supplier's control until satisfactory test results are obtained.</p> <p>If pathogen testing is done on food contact surfaces, all product lots processed over the swabbed surface(s) since the last validated sanitation cycle shall remain within the supplier's control until satisfactory test results are obtained.</p>
<b>CSAR 9</b>	<p><b>Mock recall</b></p> <p>All operations must conduct an annual mock recall to verify current contact information and that the quantities received and distributed through the next step in the item's supply chain match what was produced/distributed. The exercise may count towards one of the traceability exercises; however, there needs to be evidence that the next step up was contacted to verify current contact information and the quantities received/distributed match what was produced/distributed. The current contact information for any next step up that was not part of the exercise shall be verified on an annual basis.</p>
<b>CSAR 10</b>	<p><b>Cleaning and Sanitation</b></p> <p>All operations must have a written program in place to verify sanitation effectiveness for food contact surfaces. The program should be based on a risk assessment of the operation and validated and shall not rely solely on visual checks for sanitation verification. Examples of acceptable verification include ATP monitoring or swabbing for TPC (Total Plate Count).</p>
<b>CSAR 11</b>	<p><b>Workwear and Protective Clothing</b></p> <p>All persons must wear single use hairnet/facial hair coverings when around exposed products, regardless of risk level.</p>

Costco Specific Audit Requirement (CSAR)	Costco Specific Food Safety Requirements
CSAR 12	<p><b>Pet Food Manufacturing (applicable to Category DIIa only)</b></p> <p>With the exception of products that are extruded, chopped, formed, and cooked to the appropriate temperature under a verified preventive measures plan, as well as any of the formulated biscuit style treats that are baked, Costco requires that all whole muscle dog treats (chicken jerky, pig ears, pizzles, fish jerky, etc.) and imported dog treats (all styles) shall be irradiated.</p> <p>Per Australian Standards for pet food, if the product has been irradiated, the label must include the statement – “Must not be fed to cats”.</p>

## 7. REFERENCES

- Costco Wholesale – Food Safety & Quality Audit Expectations for Costco Suppliers. Version 2.0 of 2023.



## ANNEX A: COSTCO MODULE CHECKLIST TEMPLATE

The module only addresses areas not specifically covered or not covered to the same extent as in FSSC 22000. The Costco Module Report Checklist should always be read in conjunction with the FSSC 22000 Audit Report. The same general principles as set out in Annex 2 of the FSSC 22000 Scheme also apply to the completion of the Module Checklist.

### 1.1 AUDIT DETAILS

<b>Registered legal name</b>	Name of organization to be certified.
<b>Location/Address</b>	Full address (or other unique identification of site location i.e., GPS, GLN etc. where a postal address is not available).
<b>Contact person</b>	Name and function – if different to the FSSC 22000 audit
<b>General description of activities</b>	
<b>Scope of certification</b>	Specific to the Module, but in line with the FSSC 22000 scope
<b>FSSC 22000 report reference</b>	Record the date and type of FSSC audit delivered in order for the Module report to be linked to the FSSC 22000 report.
<b>Module Audit duration</b>	Time spent auditing the Module in hours

### 1.2 AUDIT TEAM

Name	Function	Audit delivery	Date(s)	Time
Auditor name	Includes lead auditor, auditor, translators, TE, witnessor, trainees, observers	i.e., remote/onsite	DD/MM/YYYY	08h00-17h00

### 1.3 SUMMARY OF COSTCO MODULE AUDIT FINDINGS

<b># Critical nonconformities</b>	
<b># Major nonconformities</b>	
<b># Minor nonconformities</b>	

### 1.4 COSTCO MODULE AUDIT RECOMMENDATION

<b>Recommended</b>	<input type="checkbox"/>
<b>Not recommended</b>	<input type="checkbox"/>

## 1.5 COSTCO MODULE NONCONFORMITIES

#	Requirement Reference (std., clause)	Non- conformity Grading (Minor, Major, Critical)	NC statement (incl objective evidence)	Root Cause Analysis (determine why it arose)	Corrective Action Plan (action to prevent repeat; person responsible; due date for completion)	Correction (to address the immediate issue)	Objective Evidence Reviewed (relating to the correction)	Acceptance of correction and CAP (auditor and date)
1	For example: CSAR 1	For example: Minor	Provide a clear statement of the deviation from the requirement.  Provide detailed objective evidence.	Completed by client	Completed by client	Completed by client	Indicate evidence reviewed for the correction i.e., document name and number	Auditor name and date of acceptance of Root cause analysis, CAP, correction, and objective evidence
2								
3								
4								

## 1.6 COSTCO MODULE CHECKLIST

Costco Specific Audit Requirements		Conform			Grade	If No – detail NC	NC #
Clause	Requirement	Yes	No	N/A	Minor/Major/Critical	If N/A – provide justification	
CSAR 1	Pest Control	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
CSAR 2	Supplier Approval	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
CSAR 3	Hand Wash Stations	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
CSAR 4	Glove Use	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
CSAR 5	Traceability	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
CSAR 6	Foreign Material Control	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
CSAR 7	Detection of foreign objects	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
CSAR 8	Handling of potentially unsafe products	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
CSAR 9	Mock recall	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
CSAR 10	Cleaning and Sanitation	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
CSAR 11	Workwear and Protective Clothing	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
CSAR 12	Pet Food Manufacturing (applicable to Category DIIa only)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			

**Summary of Costco Specific Audit Requirements:**

Pest Control:

Supplier Approval:

Hand Wash Stations:

Glove Use:

Traceability:

Foreign Material Control:

Detection of foreign objects:

Handling of potentially unsafe products:

Mock recall:

Cleaning and sanitation:

Workwear and protective clothing:

Pet food manufacturing (applicable to Category DIIa only):