Transitioning to FSSC 22000 Version 6

This guide explains some of the most important changes in the FSSC 22000 Version 6 requirements. While this Client Information Note gives a brief overview of the most significant requirements, it is highly recommended to review the requirements in the official FSSC scheme documents, which can be found at www.fssc.com.

Transition

In April 2023, the FSSC Foundation published Version 6 of the FSSC 22000 certification scheme. From 1 April 2024, we will start auditing against FSSC Version 6 by means of a transition audit (upgrade audit).

This transition audit will be done during the first on-site FSSC 22000 audit after 1 April 2024 and can be done during a (unannounced) surveillance audit or certificate renewal audit. The normal 3-years cycle and sequence of audits is followed, the upgrade audit shall therefore apply to the next planned regular audits whether it is a (unannounced) surveillance or recertification audit.

The unannounced audit will be planned as normal; if this unannounced audit is conducted before 1 April 2024, it will be against FSSCv5.1. If the unannounced audit is conducted after April 2024, it will be against FSSC22000 version 6.

While FSSC 22000 visits have an annual frequency, each company must transition to FSSC Version 6 before 31 March 2025. After a successful transition audit, an FSSC 22000 Version 6 certificate will be issued. If the transition is done during a surveillance audit, the validity period of the certificate remains as it was at FSSC Version 5.1. Note: all FSSC V5.1 certificates will be withdrawn after 31 May 2025.

For upgrade audits utilizing the ICT approach (partly remote/ partly on-site audit), both the remote component and the on-site component shall be completed against FSSC 22000 V6 commencing from 1 April 2024 onwards. It is not possible to conduct part of the audit to a different Scheme version.

For the FSSC modules, FSSC food/ FSSC feed/ FSSC packaging, some companies have a (separate) HQ audit for the central processes. This HQ audit shall be done before the actual audits at the production sites. If the production sites are audited against FSSC v6, the HQ audit shall also be conducted against the same version. As a result in some cases, the HQ audit shall be replanned.

The main reasons for reviewing FSSC 22000 Version 5.1 were:

1. Incorporating the requirements of the accreditation document ISO 22003-1:2022
2. Strengthening the requirements to support organizations in their contributions to meeting the UN Sustainable Development Goals (SDGs)
3. Editorial changes and amendments as part of continuous improvement.

Food chain categories

In the new accreditation document ISO 22003-1: 2022 food chain categories are mentioned. In this new document, some of those categories changed. The most important changes are:

- Introduction of the food chain category "BIII pre-process handling of plant products" and includes 'Activities on harvested plants that do not transform the product from original whole form, including horticultural products and hydrophytes for food.'
- Introduction of the food chain category "C0 Animal – Primary conversion" and includes 'Conversion of

'Conversion of animal carcasses intended for further processing including lairage, slaughter, evisceration, bulk chilling, bulk freezing, bulk storage of animals and game gutting, bulk freezing of fish and storage of game'.

- The food chain categories DIIa and DIIb (pet food production) will disappear, and pet food is now included in the categories C (food producing companies CO- CIV). The category DI (processing of feed and animal food) will

As a result, some companies will change towards a different food safety category during the certification towards FSSC 22000 V6. On the FSSC 22000 V6 certificate, the new/ adapted food chain category will be mentioned.

For companies falling under category **DIIb,** special attention is required, while the pre-requisite program for the audit will change from ISO/TS 22002-6 (animal feed) towards ISO/TS 22002-1 (food products).

As part of FSSC 22000 V6, LRQA is also performing audits for FI (Retail/ Wholesale/ E-commerce).

Additional requirements

FSSC 22000 exists of ISO 22000, pre-requisite programs and FSSC additional requirements. The clauses for ISO 22000 and the pre-requisite programs remain the same, however, the FSSC 22000 additional requirements changed.

These additional requirements can be found in Part II 'Requirements for organizations to be audited' Version 6.0 - FSSC and cover – depending on the food chain category – 18 additional requirements.
The most important changes are mentioned below and split into new requirements and adapted requirements. It is strongly advised to carefully read the requirements in section II of the FSSC 22000 V6 standard (www.fssc.com).

New requirements:

2.5.8. Food Safety and Quality culture

Although food safety culture is already embedded in ISO 22000:2018, now extended requirements are defined relating to communication, training, employee feedback and engagement and performance measurement. A documented food safety and quality culture plan with targets and timelines shall be developed.

2.5.9. Quality control

This new element covers now, besides food safety requirements also quality-related requirements. A company needs to establish, implement, and maintain a quality policy and quality objectives. Besides this, quality parameters shall be defined in line with finished product specifications and these quality parameters shall be implemented. Requirements are also defined for quantity control procedures. Lastly, in the clause, requirements are also defined for line start-up and change-over procedures, including packaging and labelling.

2.5.15 Equipment management

In this new clause, requirements are defined for purchasing of equipment, including hygienic design, legal and customer requirements and intended use of the equipment. A company shall now also establish and implement a risk-based change management process for new equipment.

2.5.16 Food loss and waste

A company shall have in place a documented policy and objectives to reduce food loss and waste. Additional requirements are defined for donation of products and managing of surplus, or by-products intended as animal feed/food. These processes shall comply with the applicable legislation, be kept up to date, and not have a negative impact on food safety.

2.5.17 Communication requirements

As already informed in the previous version of FSSC 22000 standards, a company shall inform their certification body in case of serious events and recalls. These requirements are now embedded into this new clause.

In case of serious events/ recalls, you must use our local LRQA website and navigate to 'recall/incident form' the 'contact us' section.

Most important changes in existing requirements:

2.5.1 management of services and purchased materials.

For companies in category I (food packaging-producing organizations), a new requirement is in place regarding the use of recycled packaging materials as raw materials.

2.5.2 Product labelling and printed materials

Where a claim is made on the product label or packaging (like gluten-free or sugar-free), the organization shall maintain evidence of validation to support this claim and shall have a verification system in place.

For companies in category I, detailed requirements are in place relating to artwork management and print control procedures.

2.5.5. logo use

In addition to the existing requirements for the use of the FSSC 22000, now the FSSC 22000 logo cannot be used on certificates of analysis or certificates of conformance.

2.5.6. Management of allergens

The requirements for handling and management of allergens are made more detailed and stricter. This includes now -amongst other elements – validation and verification of control measures, use of precautionary or warning labels, and reviewing of the allergen management plan on at least an annual basis.

2.5.7. Environmental monitoring

The main change in this requirement is that now also the environmental monitoring program shall be reviewed

at least annually or more often if one of the listed triggers occurs.

2.5.10 Transport, storage, and warehousing

Additional requirements are now in place when bulk transport (tankers) is used for the transportation of finished products or receiving raw materials.

2.5.11 Hazard control and measures for preventing cross-contamination.

In addition to the current requirements, now the organization shall have a risk assessment in place to determine the need and type of foreign body detection equipment. A documented procedure shall be in place for the management of and use of the equipment selected. In addition, procedures shall be in place for the management of all breakages linked to potential physical contamination (e.g., metal, ceramic, hard plastic).

The impact of these new and amended requirements will differ from company to company. It is strongly recommended to review the exact details of these requirements on a short-term basis to ensure timely implementation.

Audit times

Due to changes in the accreditation document ISO 22003-1 and the additional subject above, the audit time for FSSC 22000 audits will be revised. For many companies, the audit duration will increase. Also, the reporting time will be increased to 1 day (in most cases). On the other hand, in the case of integrated audits with management systems or food safety systems, a reduction can be given. A new audit time calculation will be made by your auditor to determine the time necessary for the FSSC v6 audit.

Follow up on major non-conformities

Major non-conformities shall be closed by the CB within 28 calendar days from the last day of the audit. If this is not possible, where completion of corrective actions might take more

time, the Corrective Action Plan (CAP) shall include the temporary measures or controls necessary to mitigate the risk until the permanent corrective action is implemented. Based on this information, a certification decision shall be taken. In addition: in case of a <u>stage 2 audit</u>, where temporary measures are accepted, the CB shall agree on a suitable timeframe with the organization, to verify the effective implementation of the permanent corrective action, <u>but no later than 6 months after the last day of the audit</u>.

Off-site activities

Where one manufacturing, processing or service process is split across more than one physical address, these locations may be covered in one audit provided that the different addresses are part of the same legal entity and under the same FSMS. This is now limited to two (2) sites (main site and satellite site) or to organizations with a campus-style set-up (multiple facilities at one location that is part of the same organization).

Additional audit documentation

Besides the audit report, an attendance register signed by a representative of the company and auditor shall be created. This document includes the start and end times of the audit and the time for the lunch break.

In addition, an integrity declaration shall be signed by a senior representative of the organization during each audit.

The FSSC foundation is working on a mandatory layout of the audit report, although this layout is not available yet, it will differ from our current layout.

Contractual amendments

Some changes have resulted in contractual amendments. In practice this means that 'Part 3 FSSC Specific conditions' of your FSSC contract with LRQA will be adjusted. This new

contract part will be sent to you soon. You will be requested to resign and return this part of the contract. More instructions on this will follow in a separate letter.

Certificates

After a successful upgrade to FSSC 22000 V6, a certificate will be created following the existing 3-years cycle. On the certificate, a QR code will be printed to facilitate a authenticity check.

Where should you start?

Start with the published version of the FSSC 22000 version 6 certification requirements and focus on the areas that are completely new or have been revised. Those are the areas that are likely to be included in your transition plan.

Begin formalizing a transition plan and process and ensure that management is involved from the start.

Preparing for change

The FSSC 22000 version 6 scheme has been published. FSSC Foundation indicated that they would publish new and adapted guidance on typical aspects of the standard on short notice. These guidelines are publicly available, so it is advised to regularly check the FSSC 22000 website.

In the meantime, you can access LRQA's FSSC 22000 V6 materials on our website, or by getting in touch with your LRQA contact.

FSSC V6 materials include:

- News article on FSSC 22000 V6 which can be found on our website.
- Webinar conducted together with FSSC 22000, which also can be found on the LRQA website (lrqa.com)
- A gap analysis checklist for FSSC 22000 V6.

FSSC 22000 V6 training will become available in the coming months and will include training on the most significant changes.