Guidance Unannounced Audits

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VERSION: 1
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Introduction

In accordance with the relevant Scheme requirements (Part III clause 3.2.2 and Part IV clause 7.3) an unannounced audit program is part of the FSSC 22000 3-year certification cycle. Participation of FSSC 22000 certified organizations in the unannounced audit program is mandatory.

At least one unannounced audit is undertaken during each FSSC 22000 3-year certification cycle.

Objectives

• To establish that the certified organization is FSSC 22000 audit ready at all times even when audited unannounced.
• To verify that the site meets all FSSC 22000 Scheme requirements.
• To provide guidance on how to manage the unannounced audit.

Planning

After the (re-)certification decision the organization should be informed by the CB that one of the two scheduled surveillance audits will be replaced by an unannounced audit. The organization is advised to inform the CB about the blackout days within 2 weeks after the CB communication.

Blackout days are time periods when the audited organization is not operating for legitimate business reasons. These are to be agreed between the CB and the certified organization to avoid periods of extreme inconvenience during which the certified organization would find it difficult to participate fully and/or there is no production. The CB is advised to require the FSSC 22000 certified organization to provide evidence that the identified blackout period was justified.

There is no minimum or maximum number of blackout days that can be claimed by the audited organization and blackout days can also include both seasonal production and possible secondary sites that are covered by the scope of certification.

It is advised that the unannounced audit will be conducted within a timeframe of 4 to 12 months after:

• The (re-) certification decision and/or
• The last day of the previous announced surveillance audit.

Execution

The CB is advised to train auditors for conducting unannounced audits.

It is also recommended that the lead auditor is an auditor who has audited the organization before and is knowledgeable with the FSSC 22000 certified FSMS.

The (lead) auditor should identify him/herself as the auditor who will conduct the unannounced audit. The organization may contact the CB to verify the auditor’s identity before allowing the auditor to proceed with the unannounced audit.
The lead auditor is expected to operate discretion in case of emergencies (e.g. fire, major catastrophic event, another audit on-going, etc.). In such cases the lead auditor, after consulting the CB certification manager, can decide to cancel the unannounced audit and plan a new date for an unannounced audit.

**Consequence of an unannounced audit**

If not present during the audit, the following functions are advised to be audited during a follow-up audit afterwards which could be conducted off-site:

- Top-management;
- Human resources;
- Outsourced supporting services;
- Procurement;
- Research and development.

However, ideally during the unannounced audit the deputy responsible persons for these and other functions are to be interviewed by the audit team to gather evidence of compliance since food safety management is everybody’s responsibility.

Production lines that are not operated regularly are to be audited during a follow-up audit in an announced manner. However, it is advised that the organization is able to start-up these production lines in order to allow auditing and avoiding a follow-up audit.

**Exemptions**

The unannounced audit is in most cases a ‘surprise audit’. However, it is not always possible to organize an unannounced audit without the cooperation of the certified organization. Examples are:

- Country specific procedures for obtaining travel permits such as visa;
- Country specific safety conditions where the auditor cannot travel to the site without a guide.

A record is kept by the CB in its file of the certified organization forming the justification of the case for later reference. As a result of the circumstances, this audit cannot be classified as an unannounced audit.

**Upgrade from FSSC 22000 version 3 to version 4**

It is not allowed to conduct unannounced FSSC 22000 version 4 upgrade audits. This has consequences for the execution of the FSSC 22000 unannounced audit program.

The below table shows when the first unannounced audit can be conducted after the scheduled FSSC 22000 version 4 upgrade audit.

<table>
<thead>
<tr>
<th>Version 3 certificate issued in</th>
<th>Version 4 upgrade audit in</th>
<th>First possible unannounced audit in</th>
</tr>
</thead>
<tbody>
<tr>
<td>2015</td>
<td>2017 or 2018</td>
<td>2019</td>
</tr>
<tr>
<td>2016</td>
<td>2017 or 2018</td>
<td>2020</td>
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<tr>
<td>2017</td>
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