

Guidance notes on certifications with more than one location

There are 3 main categories of certifications that may have multiple locations to consider:

1. Organizations where some functions pertinent to the certification may be controlled from a head office separate to the manufacturing location(s). Such organizations may or may not meet the requirements for multi-site certification as described in ISO/TS22003. For example, the head office may determine procurement policy and lead the approval of suppliers, or may take overall responsibility for the group quality management system requirements.
2. Organizations with numerous manufacturing locations.
3. Organizations with a 'split' process (where one or more process steps take place at a separate location).

1. Head office controls functions pertinent to the certification

Note 1:

- In all cases where functions pertinent to the certification are controlled by a head office or other remote location FSSC requires that those functions be audited directly with the person[s] described in the documented FSMS as having responsibility.
- This will usually mean that the auditor must attend the head office to conduct that part of the audit, but in some cases it may be appropriate for the responsible person to attend the manufacturing site. This will depend upon local access to required files, records and other evidential material.
- It is strongly recommended that the H/O audit is carried out prior to the manufacturing location audit.

Note 2:

- The head office cannot take responsibility for all functions within the scope of the certification, and cannot therefore receive a separate certificate.
- It is acceptable to mention the H/O on the manufacturing certificate by use of wording such as "An audit was carried out at (H/O location) on DDMMYY to assess the following function[s]..."

Note 3:

- An audit of H/O control of functions within the FSMS cannot assess the degree of implementation at manufacturing level. The subsequent audit at the manufacturing site(s) must therefore include a confirmation that the requirements set out by H/O are appropriately incorporated into manufacturing documents and implemented in practice.

2. Organizations with numerous manufacturing locations

Each location requires a separate audit, report and certificate, and will be entered separately on the FSSC database.

In cases where more than one manufacturing identity is used but the operations are on one site – for example where a manufacturing operation is named differently to a packing operation, both may be named on the certificate provided that:

- a. they are subject to one audit appropriate to the combined scope;
- b. they are part of the same legal entity.

The preferred description in such cases is to use the name of the legal entity as the primary name. *For example: “XYZ company, operating as ABC processing and 123 packaging, (insert address)”.*

3. Organizations with a ‘split’ process

There are occasionally cases where a company has a single manufacturing process that is split between 2 locations. (For example, a part-finished product is moved to a separate location for a specific process step or steps to be carried out, and is then either complete or is returned to the primary location for completion). Such processes may, by exception, be considered for certification under a single scope based on one audit, report and certificate. Exception may be granted only by application from the CB to the scheme secretariat, including the proposed scope and justification. No agreement should be reached or implied with the client prior to approval from the scheme.

Consideration will be given only if:

- Only 2 locations are involved – the primary manufacturing site and the secondary for defined process steps.
- There is clearly one process involved, resulting in a finished product which is within scheme scope.
- The audit must clearly include all relevant requirements at both the primary and secondary locations, and allow investigations and outcomes to be identified as location specific.
- The secondary site carries out the described process steps solely for the primary site and does not service any other sites or customers.
- The locations are under the same overall food safety management system, and part of the same legal entity.
- The certificate must show the address of both sites, but must clearly identify which is the primary site.

Dealing with Non-Conformance

Where NC’s are noted in H/O or multi-site manufacturing operations, these must be assumed to impact the equivalent procedures at all locations. Corrective actions must therefore address issues of communication across the certified locations and appropriate actions for impacted sites. Such NC’s and corrections must be clearly identified in the relevant section of the audit report.