



FSSC22000 Guidance Notes – Surveillance Audits

Version 2, 30 January 2013

Purpose: To provide additional clarity for CB's on scheme requirements for conducting and reporting surveillance audits.

Background: The scheme requirements for surveillance audits are derived from ISO 17021:2011 and GFSI Guidance Document V6.

ISO17021, Section 9.3: [Extract]

9.3.1.1: The CB shall develop its surveillance activities so that representative areas and functions covered by the scope of the management system are monitored on a regular basis, and take into account changes to its certified client and its management system.

GFSI GD V6, Section 3.5: [Extract]

3.5.1: The scheme owner shall have a clearly defined and documented audit frequency programme, which shall ensure a minimum audit frequency of one audit per year of an organisation's facility and has the scope to assess all elements of the scheme's standard.

Clearly, the application of ISO 17021 requirements alone will not fully satisfy the GFSI requirement to assess all elements of the scheme's standard.

Reporting: Your reports must cover all clauses within ISO 22000, the relevant sector specific PRP document [e.g. ISO/TS 22002-1], and the FSSC scheme requirements.

This is achieved through scheme requirements, which mandate a full review of the food safety management system to confirm that on-going compliance is assured. These requirements are described in scheme document part II, "Requirements and regulations for certification bodies", section 10, and are explained in detail below.

FSSC22000 Guidance on surveillance audits

1. "During the surveillance activities and surveillance audit the effectiveness of the food safety management system and the compliance with the requirements of ISO 22000, technical specification for sector PRPs and the additional requirements of this scheme (section 3.3 of Part 1) will be reviewed."

Guidance: This requires the auditor to consider all of the requirements described in ISO22000, the relevant PRP document [e.g. ISO/TS 22002-1] and the FSSC scheme in a manner sufficient to determine that the overall FSMS continues to comply. The depth of this review is less rigorous than at a certification or recertification audit, but the scope is the same. Appropriate methods of assessment include desk reviews of documentation and interviews with relevant personnel. The surveillance audit must always include the requirements described in ISO 17021, 9.3.2.1. and confirm compliance with ISO 22000, ISO/TS 22002-1 and the additional requirements.



2. “This shall include an examination of the food safety management system documentation on the registration of changes and of the internal communication of changes in the production process, the (origin of) raw materials, the products and product characteristics or in the context in which the food safety system is operating (e.g. changes in legislation, codes of practices, customer requirements) in the period after the previous audit. If any changes are identified by this examination or otherwise, the surveillance audit shall include a full assessment and reporting of the assessment of:
 - the documentation requirements, specifically clauses 4.2.1. and 7.3.1 of ISO 22000 and clause 1 of Section 3.3 (Appendix IA) of Part I of this scheme;
 - the establishment and implementation of the PRPs;
 - the hazard analysis and the operational PRPs and CCPs.”

Guidance: This section implements the detail required by [G] above. The focus is on changes that may have an impact on the food safety management system – as described in the list provided. Where such changes are noted, the depth of the audit becomes more rigorous, to assure that the changes have been appropriately considered, documented [ISO 22000: 4.2. 1] and implemented into the hazard analysis process [ISO 22000: 7.3. 1]. The additional FSSC scheme requirements relate to cases where the change noted may impact the provision of services or the need for training of personnel.

3. During surveillance audits it is allowed to sample activities and a number of product lines, categories and sectors covered by the scope. The sampling shall result in a representative review of the scheme implementation.

Guidance: This section applies in certified establishments where there are a number of different processes, products etc. within the scope. Having established [in 1] that the FSMS as a whole continues to comply, a selection of the processes, product or categories may be made for further examination. The selection must be made in a such a way that it is representative of the FSMS as a whole, and therefore supports the conclusions drawn in [1].

Reporting of Surveillance Audits

The GFSI requirement is described in section 3.6.4 of the Guidance Document:

“The audit report shall include sufficient detail to ensure that it clearly expresses where the site is in compliance, or not in compliance, with the scheme’s standards requirements”

The FSSC scheme requirements are described in section 7. These include [extracts]:

“Results and conclusions of the audit per clause of the normative standard or technical specification.....”

“In the result section of the report conformance of compliance or non compliance shall be indicated.
“In the summary section positive evidence of confirming compliance shall be provided”



“The audit report shall cover all elements described in the format as indicated in Part II, appendix IIB.....in order to confirm that all requirements are assessed and reported”

Guidance: The key to meeting this requirement is that appropriate evidence must be provided to support a conclusion of conformance. Whereas non conformance is described in the result column against the individual requirement of the standard, evidence of conformance need not be indicated against each individual requirement, but may be given in a summary which deals with a whole section.

Example – ISO22000 - Non Conformance:

A detailed description provided against the relevant individual requirement

ISO 22000 Reference		Yes	No	Remarks
4.2	Documentation Requirements	X		
4.2.1	General	X		
4.2.2	Control of Documents		X	Version 3 of procedure XXX, dated DDMMYY was in use in the production department. Version 4, dated DDMMYY is shown as current in the quality manual reference list.
4.2.3	Control of Records	X		
Summary: Narrative text summary of conclusions for section 4.2 as a whole				

Example – ISO22000 - Conformance:

No detailed remarks needed, a summary is given to support the conclusion of conformance

		Y	N	Remarks
4.2	Documentation Requirements	X		
4.2.1	General	X		
4.2.2	Control of Documents	X		
4.2.3	Control of Records	X		
Summary: Food safety policy and objectives reviewed – current and signed by senior management. System documents XX, YY, & ZZ examined – all comply with control requirements. A separate procedure for control of records is implemented and effective.				

Example – ISO/TS 22002-1 - Conformance:

No detailed remarks needed, a summary is given to support the conclusion of conformance

6. Utilities – air, water, energy			
6.1 General requirements	+		
6.2 Water supply	+		
6.3 Boiler chemicals	NA	No use of steam, thus no boiler chemicals used. An example of the quality monitoring is included	



6.4 Air quality ventilation	+		
6.5 Compressed Air	+		
6.6 Lighting	+		
Summary Utilities – air, water, energy: Main utilities are water (tap) and air. Quality is well monitored during periodic checks.			

Example – ISO/TS 22002-1 – Non Conformance:

A detailed description provided against the relevant individual requirement

6. Utilities – air, water, energy			
6.1 General requirements	+		
6.2 Water supply	+		
6.3 Boiler chemicals	NC	Part used containers of Boiler chemicals were stored in the production area when they should have been returned to secure storage.	
6.4 Air quality ventilation	+		
6.5 Compressed Air			
6.6 Lighting			
Summary Utilities – air, water, energy: Narrative text summary of conclusions for section 6 as a whole. E.g. Main utilities are water (tap) and air. Quality is well monitored during periodic checks.			