

Guidance notes on certifications with more than one location

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General requirement on multi site certification of multiple sites

Certification of multi-site organizations and multi-site sampling as described in ISO/TS 22003:2013 and ISO/IEC 17021:2011 is not applicable to the food chain categories C, D, E, L and M (CI – IV, DI, DII, I and K of ISO 22003:2013) of the FSSC 22000 scheme.

FSSC 22000 requires that every site shall have a separate audit, a separate report and a separate certificate. Every site must be entered separately in database.

Exceptions

FSSC 22000 does offer exceptions for three main categories of organizations that have multiple locations.

The three exception categories are:

- 1. Organizations where some functions pertinent to the certification are controlled by a head office separate to the manufacturing location(s).
- 2. Organizations with different operations at one site.
- 3. Organizations with a 'split' process (where one or more process steps take place at a separate location).

1. Organizations where some functions pertinent to the certification are controlled by a head office separate to the manufacturing location(s).

Functions pertinent to the certification but controlled by a head office separate to the manufacturing location(s) can be for example:

- Procurement policy;
- The approval of suppliers; or,
- Overall responsibility for the group quality management system requirements.

In all cases where functions pertinent to the certification are controlled by a head office, FSSC requires that those functions are audited directly in the presence of the person[s] described in the documented FSMS as having responsibility for the functions.

This will usually mean that the auditor must attend the head office to conduct that part of the audit. It is strongly recommended that the head office audit is carried out prior to the manufacturing location audit.

The lead auditor may decide that it is acceptable for the responsible person from the head office to attend the audit at manufacturing or operating site¹. The conditions under which this will be allowed depend upon local access to required files, records and other evidential material.

¹ The use of telephone or video conferencing links from the manufacturing site to interview the employees at the off-site head office, having responsibility for he functions, is not allowed.



Responsibilities

The functions at the head office are audited separately and every manufacturing site belonging to the group shall have a separate audit, a separate report and a separate certificate. The manufacturing site audit report and certificate shows which functions are audited at the head office.

An audit at the head office 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 head office are appropriately incorporated into manufacturing documents and implemented in practice.

Audit time

A maximum of 20% audit time reduction can be allowed for each of the single manufacturing sites belonging to the group where the shared functions are controlled by the (off-site) head office. The 20% audit time reduction is applied to the minimum audit time (Ts) as shown in ISO/TS 22003:2007 and ISO 22003:2013, Annex B.

See the FSSC Audit time calculation tool for guidance how to calculate the FSSC 22000 on-site audit time.

Certificate

The head office cannot take responsibility for all functions within the scope of the certification, and can therefore not receive a separate certificate.

The head office is mentioned on the manufacturing certificate by use of wording such as "An audit was carried out at (name and location of head office) on DDMMYY to assess the following function(s) (describe functions audited at the head office)".

2. Organizations with different operations at one site

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, by exception, be considered for certification under a single scope based on one audit, report and certificate provided that:

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

Certificate

The preferred description on the certificate 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 when:

- 1. Only 2 locations are involved the primary manufacturing site and the secondary for defined process steps.
- 2. There is clearly one process involved, resulting in a finished product, which is within scheme scope.
- 3. 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.
- 4. The secondary site carries out the described process steps solely for the primary site and does not service any other sites or customers.
- 5. The locations are under the same overall food safety management system, and part of the same legal entity.
- 6. The certificate must show the address of both sites, but must clearly identify which is the primary site.

Dealing with Non-Conformities

Where non-conformities are noted in head office or separate manufacturing operations, these must be assumed to have impact on 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.