

FSSC 22000 v4.1 – New additional requirements – January 2019



Introduction

On November 26th 2018, the Board of Stakeholders (BoS) for FSSC 22000 version 4.1 decided that from 31 January 2019, new additional requirements shall be taken into consideration by CBs (Certification Bodies).

The reason for adding new requirements is because FSSC 22000 is benchmarked against the GFSI (Global Food Safety Initiative). The FSSC 22000 scheme follows an extensive benchmarking process using the requirements that are laid out in the so called GFSI Guidance Document/Benchmarking requirements. As a result of this, FSSC 22000 must be adapted on thirteen requirements

As per 31 January 2019, CBs (i.e. assessors) shall take these thirteen new additional requirements into consideration and assess the extent to which you are compliant to these requirements. The additional requirements are outlined and explained in to more detail in the following chapters. Please note that most requirements only apply to a certain food chain (sub-)category. An overview of the different food chain categories can be found at Part II – requirements of certification – page 3. The food chain category can also be found at 'organization profile' in your FSSC report.

Additional ISO 22000 requirements

The FSSC 22000 scheme consists of three components: ISO 22000, sector specific PRPs (prerequisite programs) and FSSC 22000 requirements.

In addition to the requirements laid out in the ISO 22000 (version 2005) standard, the following new requirements apply as of January 1, 2019:

Product release procedure

In addition to clause 7.10.3 'Handling of potentially unsafe products' companies are now required to have a product release procedure in place.

Clause 7.10.3 is all about handling potentially unsafe products. The clause prescribes how each lot of product that is affected by nonconformity shall be released only under certain conditions. The additional requirement takes it a step further. You are now required to define in a procedure how your product release system works.

This requirement only applies to food chain categories C (perishable/ambient stable animal/plant products, I (food/feed packaging), G (transport and storage) and K ((bio)chemicals).

Test of incident management procedure

In addition to clause 5.7 'Emergency preparedness and response', you are now required to have an incident management procedure in place that is regularly tested.

In clause 5.7, top management is required to establish, implement and maintain procedures to manage potential emergency situations and accidents that can impact food safety. Additionally, you now need to regularly test this procedure. Incident test examples could be, for example, the failure of cooling cells.

This requirement only applies to food chain categories C, D (feed/animal food), I, G and K

Traceability of final products

In addition to clause 7.9 and in line with regulatory and statutory requirements in many countries, you are now required to have specified traceability requirements in place for the unique identification of final products.

In clause 7.9 it is stated that you shall have a system in place that enables the identification of product lots and their relation to batches of *raw materials, processing and delivery records*. This is now extended with *final products*. Although it is likely that you already comply with this requirement, this shall be assessed from now on.

This requirement only applies to food chain categories C, I and K.

Additional ISO/TS 22002-1 requirements

The technical specification ISO 22002-1:2009 is one of the sector specific prerequisite programs and relates to Food manufacturing.

In addition to the requirements laid out in the ISO 22002-1:2009 standard, the following new requirements apply as of January 1, 2019:

Procurement of animals, fish and seafood

In addition to ISO/TS 22002-1 clause 9.2 ('Selection and management of suppliers') and in line with regulatory and statutory requirements in many countries, you are now required to have a policy in place for the procurement (i.e. the process of obtaining something) of animals, fish and seafood which are subject to control of prohibited substances such as pharmaceuticals, veterinary medicines, heavy metals and pesticides.

This is related to check if animals did not or have not used any prohibited substances.

This requirement only applies to food chain sub-category CI (processing of perishable animal products).

Slaughter time and temperature

In addition to ISO/TS 22002-1 clause 16.2 ('Warehousing requirements'), you are now required to have specified requirements in place that define post-slaughter time and temperature in relation with chilling or freezing of the products.

This requirement only applies to food chain sub-category CI.

Animal inspection process

In addition to ISO/TS 22002-1 clause 10.1 and in line with regulatory and statutory requirements in many countries, you are now required to have specified requirements in place for an inspection process at lairage (i.e. holding pens) and/or at evisceration (i.e. removal of internal organs) to ensure animals are fit for human consumption.

In clause 10.1 (part of chapter 10 'Measures for prevention of cross-contamination'), general requirements are placed. It states that programmes shall be in place to prevent, control and detect contamination. The additional requirement requires you to be more specific. You shall now specify requirements for the inspection of lairages and/or at evisceration.

This requirement only applies to food chain category CI.

Additional ISO/TS 22002-4 requirements

The technical specification ISO 22002-4:2013 is one of the sector specific prerequisite programs and relates to Food packaging manufacturing.

In addition to the requirements laid out in the ISO 22002-4:2013 standard, the following new requirements apply as of January 1, 2019:

Food contact and claims

In addition to ISO/TS 22002-4 clause 4.6.3, you are now required to have specified requirements in place when recycled material, plant based material or functional additives are used.

In 4.6.3 'Incoming raw materials' it is stated that all incoming raw materials shall be inspected, tested or covered by COA/DOC to verify conformance to specified requirements prior to acceptance or use. This additional requirement is more specific; you are now required to provide sufficient data/information about safe food contact and documentation of claims.

This requirement only applies to food chain category I.

Packaging with a functional effect on food

In addition to ISO/TS 22002:4 clause 4.14, you are now required to have specified requirements in place in case packaging is used to impart or provide a functional effect on food, such as shelf life extension, shall, where known, be effective within its own specified criteria (only for food chain category I).

Materials transported in the same vehicle

In addition to ISO/TS 22002-4 clause 4.7, you are now required to assess that the organization has addressed the potential for contamination from other materials carried on the same vehicle.

Although a generic statement is placed in clause 4.7 ('Measures for prevention of contamination') about the prevention of contamination, you shall now provide more information about potential contamination from other materials carried on the same vehicle. In other words, a more extensive evaluation will be done during the audit by your auditor.

This only applies to food chain category I.

Medical screening

In addition to ISO/TS 22002-4 clause 4.10.5, you are now required to have a medical screening procedure in place when permitted by law to identify conditions impacting food safety.

In 4.10.5 ('Illness and injuries') it is stated that a medical screening procedure *may* be in place. This is now a requirement (provided this permitted by law).

This only applies to food chain category I.

Additional FSSC Additional Requirements

As mentioned earlier in this note, the FSSC 22000 scheme has three required components: ISO 22000, sector specific PRPs and FSSC Additional Requirements. FSSC 22000 adds specific requirements to ensure consistency, integrity, and to provide governance and management of the scheme.

In addition to the FSSC Additional Requirements that are laid out in the FSSC 22000 Part II: Requirements for Certification, the following new requirements apply as of January 1, 2019:

Supplier approval in case of emergency

In addition to FSSC 22000 Additional requirement 2.1.4.1, you are now required to assess if the organization, in case of an emergency, assesses a non-approved supplier and that the service which it supplies meets the specification.

Requirement 2.1.4.1 is all about Management of Services. It requires you to manage, assess and monitor service providers. It is now acceptable to use a non-approved supplier in an emergency situation provided that the facility has been assessed, for example by checking if the supplier has an FSSC (i.e. GFSI recognized) certificate and the product/services meets the specification(s).

This requirement applies to food chain categories C, D, I, G and K.

Use of feed ingredients

In addition to FSSC Additional Requirement 2.1.4.8.2, you are now required to properly manage the use of ingredients that can be deleterious (i.e. harmful) to certain classes of animals.

The clause in which requirement 2.1.8.2 is placed is related to *pet food for dogs and cats only*. You now have to take into consideration that, for example, certain ingredients can be more harmful to puppies than to dogs.

This requirement only applies to sub-category DII (pet food for dogs and cats only).

In addition to the follow-up of Minor NCs

In addition to the follow-up of Minor NCs issued during any new audit as from 1 January 2019, you are now required to provide the CB *evidence of the correction*. Evidence of the correction shall be sent to the CB for verification and approval at latest 3 months after the audit.

This is additional to what is already in place in the current procedure regarding the follow-up of nonconformities. However, not only shall the correction be communicated whenever a Minor NC is raised, but now also supporting evidence of the correction shall be provided.

You may correct a Minor NC immediately during the audit. In that case the auditor will assess the correction and report on it. For example: during the audit a Minor NC was raised because it was noticed that the boiler chemicals were not stored separately from the food production area. You shall provide evidence of the correction and you may provide this to the auditor during the audit. In case you cannot provide evidence of the correction during the audit, you shall send in the evidence of the correction for verification and approval before the remote review, which takes place 3 months after the audit.



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CIN056
Revision 0, 20 December 2018

