

# IFS PACsecure Doctrine



## Foreword

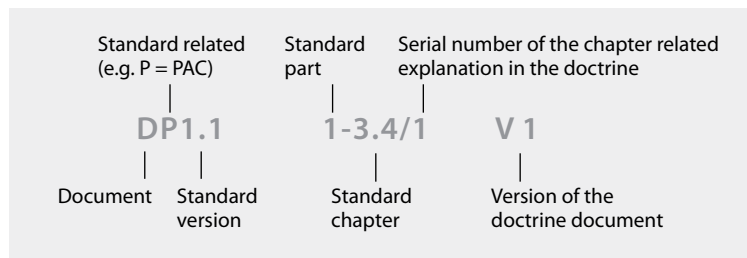
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This document provides additional clarification to the IFS PACsecure Standard. The doctrine is available to certification bodies, certified companies and all other IFS users.

All explanations and decisions of this document apply from the date of its publication unless a different date of application is specified.

The following doctrine is a collection of several descriptive documents. Each document has its' own name and the first three signs indicate the type of document. In the example below, the first two letters stand for Doctrine PACsecure, and the number 1.1 for the Standard version 1.1. The second section of the name specifies the part of the Standard to which the documents refers (the IFS PACsecure Standard is divided into different parts which are again subdivided into different chapters). The third section indicates the chapter of the Standard and the number after the backslash marks the number of the explanation in the doctrine itself.

E.g. DP1.1 1-3.4/1 V1 means the document is the version 1 of the IFS PACsecure Doctrine, which contains an explanation referred to the chapter 3.4, of the first part of the IFS PACsecure Standard version 1.1.



The document name is followed by the version of the Doctrine document to enable the reader to follow the changes.

This new document system enables the user to exchange only the modified pages instead of the whole document. All changes are described in the content overview on the first pages and these pages will be updated with each change. Please note that the comment "re-worked wording" indicates a grammatical correction or improvement of the language flux. Any changes in the content are additionally marked.

In the digital version of the doctrine, links allow users to search for specific clarifications. Clicking on the explanation of interest will lead to the relevant document.

**The application of newly introduced or adapted rules is always two (2) months after publication of the relevant version, if not specified otherwise.**

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## Part 1 – Audit Protocol

### 1.3 Types of audit

#### 1.3.4 Extension audit

In specific situations, such as new products and/or processes to be included in the audit scope or each time the audit scope would need to be updated on the certificate, then, for an IFS PACsecure certified company, it is not necessary to perform a complete new audit, but to organise an on-site extension audit during the validity period of the existing certificate. The certification body is responsible for determining relevant requirements to be audited and relevant audit duration. The extension audit shall be performed by the auditor who performed the “normal” audit. The report of this extension audit shall be represented as an annex adjoined with the current audit report. Conditions for passing the extension audit (relative score  $\geq 75\%$ ) are the same as normal one, but only focused on specific requirements which have been audited; the original audit score does not change.

If the extension audit demonstrates compliance, the certificate shall be updated with the new scope and uploaded in the Audit Portal.

The updated certificate shall keep the same due date of end of validity as the current certificate.

If, during the extension audit, a Major non-conformity or a KO (Knock Out non-conformity) has been identified, the full audit is failed and the current certificate shall be suspended as described in 5.8.1 and 5.8.2.

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## CLARIFICATION ON PART 1 – 3.4 EXTENSION AUDIT

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### 1.3.4.1 **How is the renewal audit managed during the following year when an extension audit has been performed?**

In the renewal audit all IFS PACsecure Requirements shall be audited by the auditor. It shall also include the activity which has been audited during the extension audit (all in one certificate).

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## CLARIFICATION ON PART 1 – 3.4 EXTENSION AUDIT

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### 1.3.4.2 In which other situations should an extension audit be performed?

An extension audit shall be performed to observe processes which were not working during the audit. However, the application scope of this requirement should be limited to avoid that extension audits are systematically performed for lines which were not working during the audit.

Therefore; an extension audit shall always be performed as long as the hazard analysis/risk assessment study (especially the CP's, and CCP's if applies) and/or products are different from the one(s) audited during the main audit. This rule also applies in case of production lines which were not working during the "main" audit and/or if a significant change to the production process and/or its environment has been made.

## Part 1 – Audit Protocol

### 1.4 Scope of the audit

The scope of the audit shall be defined and agreed between the company and the certification body before the audit takes place. The scope shall be clearly and unambiguously stated in the contract between the company and the certification body, in the audit report and on the certificate.

The audit shall be performed at a time to ensure the full scope of products and processes, as mentioned in the report and on the certificate, can be effectively assessed.

If, between two certification audits, new processes or products different from those included in the scope of the current IFS PACsecure audit are implemented, the certified company shall immediately inform its certification body, who shall perform a risk assessment to decide whether an extension audit should be performed or not (see also 3.4). The results of this risk assessment, based on hygiene and safety risks, shall be documented.

The audit shall be specific to the site where all the processing of the products is undertaken. Where decentralized structures exist and the audit of a certain location is insufficient for gaining a complete view of the company's processes, then all other relevant facilities shall also be included in the audit. Full details shall be documented within the company profile in the audit report.

The audit scope shall include the complete activity of the company (i.e. the same kind of production on several lines for products under industry brands and retailer/wholesaler brands). The scope shall be reviewed and agreed at the beginning of the audit after an initial risk assessment. Furthermore, the scope can be modified after the risk assessment (for instance, if a further activity interferes with the one concerned by the audit scope).

The audit scope shall make reference to the audited product scope(s) corresponding to the type of packaging materials being processed/converted during the audit (see Annex 3).

If, under exceptional circumstances, the company decides to exclude specific product ranges (product lines) from the scope of the audit, then this shall be clearly noted and included in the audit report and on the IFS PACsecure certificate.

## // 1.4 Scope of the audit

**Auditing of multi-location companies with central management**

If defined processes are centrally organised in a company with several production sites (e.g. purchasing, personnel management, complaint management), the central managing site—headquarter—shall also be audited and relevant audited requirements outcome shall be considered in the audit reports of each production site.

**Note:** Each production site shall be audited separately in a period of maximum 12 months after the central managing site and shall have its own audit report and certificate. Each site shall be mentioned in the relevant contract. If the central managing site does not have any production activity, this site cannot be IFS certified as an independent company. The time for auditing the central managing site shall be described in the company profile of the report.

The audit of the managing site shall always take place before the audit of each production site in order to have a preliminary overview.

**Note:** If it is not possible to perform an audit at the managing site, then it shall be ensured that, during the audit of the production site, all necessary information from the managing site is available (e.g. a representative of the managing site should attend at the audit(s) of the production site(s)).

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## CLARIFICATION ON PART 1 – 4 SCOPE OF THE AUDIT

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### 1.4.1 Clarification on scope of the audit

The IFS PACsecure Audit is applicable for the production, processing and/or conversion of packaging components and/or packaging materials (printed or not), intended to be used as primary or secondary packagings in food products, cosmetics, personal hygiene products and household products, and in general, any goods under the current scope of the IFS Standards. Pharmaceutical products, medical devices, explosive substances/munitions, or similar materials, waste/litter and resources are not included in the current IFS PACsecure Audit Scope, therefore, cannot be mentioned in the certificate. If the company asks for the visibility of such products, a reference can only be made in the company profile.

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## CLARIFICATION ON PART 1 – 4 SCOPE OF THE AUDIT

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### 1.4.2 What are the IFS rules for accepting exclusions in the audit scope, as exclusions should be managed “under exceptional circumstances”?

By definition, all processes and products which are managed by the company/legal entity, on the same site, and which are under their responsibility, must be included in the scope of an IFS PACsecure Audit according to its intended applicability.

All processes and products shall be included in the audit scope. The identification of exclusions shall only be an exceptional situation and it can only be related to products exclusions.

Please, note that private label (retail/wholesale branded) products cannot be excluded.

If product exclusions are defined (under exceptional circumstances), the following rules shall be fulfilled:

- The company must inform the reasons for products exclusion, and provide all relevant and documented evidence to support that the contamination risk between the included and excluded products is adequately controlled.
- If the certification body accepts the exclusion request, the acceptance reasons must be justified and documented. The certification body can approve the exclusion only when the auditor verifies on-site the relevance of the exclusion.
- Any excluded products which would have not been justified and noticed by the auditor during the audit, it shall be assessed either directly during the audit (with a necessary review of audit scope and maybe audit duration) or through a later extension audit.
- The exclusion shall always be specified on the certificate and in the company profile of the audit report.
- Product exclusion will always have to be re-defined and reviewed each year by the certification body, to ensure that the product exclusion is still acceptable and that the audit scope is still up-to-date.

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## CLARIFICATION ON PART 1 – 4 SCOPE OF THE AUDIT

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### 1.4.3 About the management of outsourced processes

If in the site audited against IFS PACsecure Standard, the company outsources parts or all of its processes to another site, the requirements of relevant chapters shall be assessed and the following rule applies:

Requirements for the site being IFS PACsecure Audited:

- **Scope of certification:** product scopes and processes applicable for the site being IFS PACsecure Audited.
- **Certificate and report:** the following sentence shall be added beneath the description of products and processes: "Beside own production, company has outsourced processes and/or products"
- **Company profile:** detailed description of processes and/or products outsourced and related certification status of the site appointed for the outsourcing process.
- **Auditor competences:** auditor qualification for product/s scopes of the site being IFS PACsecure Audited.
- **The company shall approve the supplier of the outsourced processes through:**
  - certification against IFS PACsecure or other GFSI recognized standard in the related scope OR,
  - documented supplier audit, performed by an experienced and competent person, which shall include, as a minimum, requirements for product safety, product quality, legality and authenticity.
- The company shall have it documented in the quality and product safety management system and ensure control over such processes to guarantee that quality and product safety are not compromised. Control of such outsourced processes shall be identified and documented.

**Note:**

- Outsourced storage and/or transport activities shall not be considered as outsourced processes and shall be managed in relevant IFS PACsecure Chapters (4.14 and 4.15), especially through the assessment of requirements 4.14.6 and 4.15.7.
- The rule of outsourcing applies for both private label products and company branded products.
- If requirements for outsourced processes are not respected, it may lead to a non-conformity scoring for the site being IFS PACsecure Audited.
- Additional services provided by third parties like pest control, maintenance, external product safety assessment, etc. are not considered as outsourced processes.

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## CLARIFICATION ON PART 1 – 4 SCOPE OF THE AUDIT

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### 1.4.4 About the management of trade products

Trade products are products which are processed, converted and/or printed by and under a different company name than the company being IFS PACsecure Certified.

Trade products, as above defined, are not covered by the scope of the IFS PACsecure Audit.

Therefore, the following requirements apply:

- It's not possible to include trade products in the audit scope of IFS PACsecure. No exclusion on the certificate is necessary.
- It shall be specified in the company profile of the audit report whether the company also manages trade products, but those will not be included in the IFS PACsecure Certification.

If the packaging material manufacturer would like to also certify these trade products, then applies a combined audit with IFS Broker.



## Part 1 – Audit Protocol

### 1.5 The certification process

#### 1.5.2 Certification body selection—contractual arrangements

In order to undertake the IFS PACsecure audit, the company shall appoint a certification body which is approved to perform such audits. It is the responsibility of the company to verify that the certification body is accredited for IFS PACsecure certification.

Only those IFS approved certification bodies—which shall be accredited to ISO/IEC 17065 for IFS PACsecure and shall have signed a contract with IFS (see Part 3)—can carry out IFS PACsecure audits and issue certificates. The list of all IFS international approved certification bodies, by country, is available on the website [www.ifs-certification.com](http://www.ifs-certification.com).

Certification bodies can have auditors qualified for one or several product scopes. Confirmation of the product scopes for which the certification body can perform audits shall be obtained from the individual certification body.

IFS PACsecure audits can be carried out by an audit team only if all members of the audit team are IFS approved auditors. Additional requirements for audit teams are described in detail in Part 3 of the Standard, chapter 3.6.

An auditor is not allowed to perform more than 3 consecutive audits of the same production site (whatever the time between audits); rules in case of audit team are also detailed in Part 3, chapter 3.6.

A contract shall exist between the company and the certification body detailing the scope of the audit, the duration and reporting requirements. The contract shall have a reference to Integrity Program (see chapter 12), in relation to the possibility of on-site audits organized by Quality Assurance Management of the IFS offices.

## // 1.5.2 Certification body selection—contractual arrangements

The audit shall take place when products of the audit scope are being processed/converted.

The audit shall preferably be carried out in the language of the company being audited and the certification body shall make every attempt to appoint an auditor whose native language or main working language is the language of the company. If this is not possible, the audit should be carried out in English language. Furthermore, languages used by the auditor for leading an audit—others than native language—shall be approved by IFS offices prior to undertaking audits (see also Part 3).

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## CLARIFICATION ON PART 1 – 5.2 CERTIFICATION BODY SELECTION—CONTRACTUAL ARRANGEMENTS

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### 1.5.2.1 Are there any rules for the use of translators during an IFS PACsecure Audit?

In general, the audit shall preferably be carried out in the working language of the production site. If this is not possible, the use of the translator shall be necessary in cases where the quality of the IFS Audit is not ensured and/or can be compromised. In the event of use of a translator:

- a. If translator needs to be present during the complete audit, 20% of total audit duration shall be added to ensure proper audit performance.
- b. In any other case (e.g. only for documentation reviewing, or for interviews during the audit process), it is under the responsibility of the certification body to establish the time needed with her/him during the audit.
- c. The requirements for the use of translator are the following:
  - experienced person in translation activity, familiar with the technical terms to be used in the audit.
  - the certification body performing the audit shall contact the translator to ensure independency.

Note: The certification body is responsible for ensuring the quality of the audit; therefore, the certification body has to check the situation in regards to the language, taking into account the complete audit process (e.g. interviews, reviewing of documented information) before the audit.

## CLARIFICATION ON PART 1 – 5.2 CERTIFICATION BODY SELECTION—CONTRACTUAL ARRANGEMENTS

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### 1.5.2.2 Auditor sharing

There are two possibilities to share auditors between certification bodies:

#### 1) Borrowing of auditors

For a spot sharing of an auditor, both certification bodies shall compose a short agreement concerning the lending/borrowing of the auditor. The agreement shall be sent to the IFS Office at latest two (2) weeks in advance of the audit.

The agreement shall contain at least:

- day of audit
- name of the company, COID and address of the site
- name of shared auditor
- signature of both certification body managers of the IFS Contracted Certification Bodies
- signature of a responsible person notified to IFS from both IFS Contracted Organizations

#### 2) IFS certification body working group

If certification bodies wish to share auditors more frequently, a short contract can be requested from the IFS Office in Berlin. This agreement allows two or more certification bodies to work together by sharing one pool of auditors. The responsibilities for the audits, training of auditors, reviewing etc. are clearly separated. Only audit date and scope can be seen by the partner; company names are invisible.

## CLARIFICATION ON PART 1 – 5.2 CERTIFICATION BODY SELECTION—CONTRACTUAL ARRANGEMENTS

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### 1.5.2.3 **Uploading documents during the process of borrowing auditors: new system**

The rule for lending auditors applies but it is not necessary to contact IFS for the upload of the report. IFS will be informed automatically when audits are uploaded using auditors assigned to different certification bodies.

The search bar can be used to find and select the auditor who performed the audit. Furthermore the lead or co-auditor status can be assigned at this point.

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## CLARIFICATION ON PART 1 – 5.2 CERTIFICATION BODY SELECTION—CONTRACTUAL ARRANGEMENTS

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### 1.5.2.4 Use of a technical expert within an audit team in specific emerging markets

In exceptional cases, e.g. when a certification body does not have direct access to an IFS PACsecure auditor with a qualification in the scope(s) required or cannot sign a short-term contract with another certification body to access their auditors, IFS allows the following exception.

Audits may be carried out by a team consisting of:

- an approved IFS PACsecure auditor, and
- a technical expert on the requested field

The technical expert shall meet the following criteria:

- Have a contract with the certification body for which the audit is to be undertaken. The contract shall include clauses to ensure confidentiality and prevent conflicts of interest.
- Meet the criteria for work experience established in the IFS PACsecure auditor qualification requirements (product scopes for IFS PACsecure version 1.1).
- Have completed a training course in Food/Packaging hygiene (including HACCP/ risk assessment) training, as defined in the IFS PACsecure auditor requirements or have demonstrable competence in these areas.
- Have received the IFS PACsecure Auditor Training, via in-house by the certification body or via eLearning by the IFS Academy.

The CB shall also ensure the following requirements are met:

- Maintain evidence of the experience and qualifications justifying the person's status as a technical expert. This shall be made available on request to the IFS offices.
- The role of the technical expert within the audit team shall be clearly defined and the qualified IFS PACsecure auditor shall be considered as the team leader.
- The technical expert must be accompanied during the whole audit by the IFS PACsecure lead auditor.
- The benefit for the IFS PACsecure auditor is that this audit performed with an expert can be used as evidence when applying for a scope extension.
- The technical expert shall appear on the IFS PACsecure audit report in the list of participants.

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## Part 1 – Audit Protocol

### 1.5 The Certification Process

#### 1.5.3 Duration of an audit

The certification bodies have an appropriate system for estimating the minimum time needed for an audit.

A number of factors, which are detailed in the contract between the certification body and the company, play a role in determining the time required for a comprehensive audit. They include:

- the size of the site
- the type of production/conversion process
- the scope of the audit
- the number of production lines involved
- the number of personnel employed at the site
- the number of non-conformities found in the previous audit.

Experience shows that the minimum audit duration on site shall be 2 working days. Exceptions to this requirement, including decreasing linked to multi-site companies, shall be precisely explained by the certification body/the auditor on the first page of the report, in the "company profile" field.

The audit duration might be extended, depending on the above factors. If the auditor estimates that additional time is necessary, the audit duration shall be extended.

The above-mentioned requirements shall apply equally to renewal audits, which shall be considered as completely new audits.

A normal audit day duration is 8 hours.

Independently from audit duration, besides on-site audit, preparation of the audit shall be at least 2 hours.

1/3 of the audit duration shall be spent, as a minimum, in the production/converting area of the site.

Additionally, time for generation of the audit report is typically 0,5 days.

## // 1.5.3 Duration of an audit

Note 1: For multi-location companies, audit duration could be decreased by a maximum of 0,5 days, if requirements have already been audited at the central managing site.

Note 2: For an audit team, the minimum audit duration shall be 1 day. In addition to the calculated audit time, minimum 2 hours shall be added. This additional time shall be allocated to the team and not to an individual auditor for common tasks (e.g. opening and closing meeting, discussion about audit findings, etc.).

See also Part 3, chapter 3.6 about audit team.

> 1	Audit Protocol
> 1.5	The Certification Process
> 1.5.3	Duration of an audit
> 1.5.3.1 DP1.1 1-5.3/1 V1	What is the definition of "total number of employees"?
> 1.5.3.2 DP1.1 1-5.3/2 V1	Is there a limit for the daily audit duration?
> 1.5.3.3 DP1.1-1-5.3/3 V1	Minimum audit duration including audit teams

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## CLARIFICATION ON PART 1 – 5.3 DURATION OF AN AUDIT

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### 1.5.3.1 What is the definition of “total number of employees”?

If, for instance, the company normally has 100 employees (during most time of the year), but, for one month, the company has added 30 employees, then these employees shall be considered for the total number of employees of the production site.

Therefore, the company shall count the total maximum number of employees reached during a year (here 130).

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## CLARIFICATION ON PART 1 – 5.3 DURATION OF AN AUDIT

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### 1.5.3.2 Is there a limit for the daily audit duration?

In general, the daily audit duration is eight (8) hours (without lunch break), and it shall never exceed ten (10) hours.

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## CLARIFICATION ON PART 1 – 5.3 DURATION OF AN AUDIT

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### 1.5.3.3 Minimum audit duration including audit teams

As it is written in the IFS PACsecure Standard, the minimum audit duration is established in two (2) working days.

This rule also applies to audit teams, where for example, a minimum of 8 h per auditor makes 16 h in total, thus the rule of the minimum duration is still ensured. Furthermore, additional time shall be allocated to the audit team, to ensure sufficient time for common auditors' tasks e.g. opening/closing meeting, team discussions etc. This additional time shall be at least 2h and this situation shall be described in the overall summary of the audit report.

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## Part 1 – Audit Protocol

### 1.5 The Certification Process

#### 1.5.4 Drawing up an audit time schedule

The certification body shall provide the audit time schedule. The audit time schedule includes appropriate details concerning the scope covered and the complexity of the audit. The audit time schedule shall be sufficiently flexible to respond to any unexpected events which may arise during the site inspection activity within the certification audit. The audit time schedule takes into consideration a review of the audit report and action plan relating to the previous audit, whatever the date when the previous audit has been performed. It also specifies which of the company's products or product ranges are to be audited. The company can only be audited at a time when it is actually producing/converting the products specified in the scope of the audit. The audit time schedule shall be sent to the auditee before the audit, to ensure availability of responsible persons at the day of the audit.

In case of an audit team, the audit time schedule shall clearly indicate which auditor performs which part of the audit.

If the IFS PACsecure audit is performed in combination with another standard/norm, the audit time schedule shall clearly indicate when each standard or part of it has been audited.

The audit shall be scheduled based on the following steps:

- the opening meeting
- the evaluation of existing quality and product safety systems; achieved by checking documentation (HACCP/risk assessment, quality management documentation)
- the on-site inspection and interviewing of the personnel
- the final conclusions drawn from the audit
- the closing meeting.

The company will assist and co-operate with the auditor during the audit. As part of the audit, personnel from different levels of management are interviewed. It is advisable that the company's senior managers are present at the opening and closing meetings so that any deviations and non-conformities can be discussed.

#### // 1.5.4 Drawing up an audit time schedule

The auditor(s) who conduct(s) the audit will assess all the requirements of IFS PACsecure which are relevant to the company's structure and function.

During the closing meeting, the auditor (or lead auditor in the case of an audit team) shall present all findings and discuss all deviations and non-conformities which have been identified. As specified by ISO/IEC 17065, the auditor may only issue a provisional assessment of company's status during the closing meeting. The certification body shall issue a provisional audit report and outline an action plan to the company, which shall be used as a basis for drawing up corrective actions for the determined deviations and non-conformities.

The certification body is responsible for making the certification decision and the preparation of the formal audit report after the receipt of the completed action plan. The issue of the certificate is dependent on the audit results and on agreement on an appropriate action plan.

> 1	Audit Protocol
> 1.5	The certification process
> 1.5.4	Drawing up an audit time schedule
> 1.5.4.1 DP1.1 1-5.4/1 V1	Mandatory document to be signed by a representative of the audited site and auditor(s) (if applicable also trainee, Auditor in Progress, auditor under observation or observer for Witness Audit) at the end of the audit

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## CLARIFICATION ON PART 1 – 5.4 DRAWING UP AN AUDIT TIME SCHEDULE

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### **1.5.4.1 Mandatory document to be signed by a representative of the audited site and auditor(s) (if applicable also trainee, Auditor in Progress, auditor under observation or observer for Witness Audit) at the end of the audit**

The document shall state the audit dates and for each audit day the starting time and ending time of the audit.

For each audit day a representative of the audited site and the auditor/s (lead auditor and co-auditor/s and if applicable also an attending trainee, Auditor in Progress, auditor under observation or observer for Witness Audit) have to sign with their signature in order to confirm their attendance.

The certification body is free to include this registration in their already existing document forms or to create a new document form to fulfil this obligation. IFS Office does not require a special document form.

This document has to be part of the audit documentation to be available on request at the certification body office having a contract with IFS Management GmbH. It will be mandatory to have this signed document at the end of each IFS PACsecure Audit.

## Part 1 – Audit Protocol

### 1.5 The Certification Process

#### 1.5.8 Scoring and conditions for issuing audit report and certificate

##### 1.5.8.4 Specific management of the audit process in case of multi-site companies

All KO requirements shall be audited at all sites even if some of them are partly managed at the central managing site.

In the audit report of each site, only the audit date of the respective site shall be mentioned; the audit date of managing site is not additionally necessary.

In case that a Major non-conformity or a KO scored with D has been issued during the audit of the central managing site, all audited production sites are also affected and the certificates of these sites shall be suspended (according the procedure described above).

After a successful audit of the central managing site (or after positive follow-up after a Major was issued in the central managing site), the certificates of the production sites can be reinstated. Depending upon which non-conformity has been issued in the central managing site, a new audit of the production sites may also be necessary.

> 1	Audit Protocol
> 1.5	The Certification Process
> 1.5.8	Scoring and conditions for issuing audit report and certificate
> 1.5.8.4	Specific management of the audit process in case of multi-site companies
> 1.5.8.4.1 DP1.1 1-5.8.4/1 V1	How is a situation managed where a deviation, which had been identified during the central managing site audit, has been solved and checked by the auditor during the site audit?

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## CLARIFICATION ON PART 1 – 5.8.4 SPECIFIC MANAGEMENT OF THE AUDIT PROCESS IN CASE OF MULTI-SITE COMPANIES.

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### **1.5.8.4.1 How is a situation managed where a deviation, which had been identified during the central managing site audit, has been solved and checked by the auditor during the site audit?**

If there is objective evidence that the deviation first noticed at the central managing site has completely been solved, it should be possible to rate the respective requirement as an A. This can be accepted under the following conditions:

- The respective central managed process can also be checked completely at the site and the previously rated deviation at the central managing site can be solved with objective evidence.
- The check of corrective actions which allows closing the deviation shall be done during the audit of all following sites.
- The auditor needs time to check the implementation of corrective actions for this deviation noticed previously at the central managing site. More than likely a full reduction of audit time (0,5 days) would no longer be applicable (as it would normally be possible in this audit constellation). This decision is under the responsibility of the certification body.



## Part 1 – Audit Protocol

### 1.6 Awarding the certificate

#### 1.6.1 Deadline for awarding the certificate

The certification body is responsible for the decision to award or not award the IFS PACsecure certificate. The decision is made by person(s) other than those who have carried out the audit. The certification shall be valid effectively from the date of issue stated on the certificate itself and shall end after 12 months. The date for the renewal audit shall be calculated from the date of the initial audit, not from the date of issue the certificate. If the audit is not performed in due time, the retailers or other users will be informed via the Audit Portal.

The time between the date of the audit and the awarding of certificate is determined as follows:

- 2 weeks to draw up the pre-report of the audit
- 2 weeks for the company to respond to the deviations and non-conformities (i.e. draw up the action plan)
- 2 weeks for the auditor to check the proposed corrective actions, for the certification procedure and upload of the audit report, the action plan and the certificate to the Audit Portal.

In total: 6 weeks between the date of audit and uploading the audit report to the Audit Portal and awarding the certificate:

- Target time: 6 weeks,
- Maximum time: 8 weeks.

> 1	Audit Protocol
> 1.6	Awarding the certificate
> 1.6.1	Deadline for awarding the certificate
> 1.6.1.1 DP1.1 1-6.1/1 V1	Is the date to be considered as the starting point for calculating – 8 weeks/+ 2 weeks for the certification cycle the first or the last day of audit?
> 1.6.1.2 DP1.1 1-6.1/2 V1	Which day is the last day of the certificate validity?

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## CLARIFICATION ON PART 1 – 6.1 DEADLINE FOR AWARDING THE CERTIFICATE

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### **1.6.1.1 Is the date to be considered as the starting point for calculating – 8 weeks/+ 2 weeks for the certification cycle the first or the last day of audit?**

The last day of audit shall be used to calculate the time window – 8 weeks/+ 2 weeks.

[ALL CLARIFICATIONS >](#)

## CLARIFICATION ON PART 1 – 6.1 DEADLINE FOR AWARDING THE CERTIFICATE

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### 1.6.1.2 Which day is the last day of the certificate validity?

The last day of the certificate validity is: initial audit date (last day) + 8 weeks – 1 day + 1 year.

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## Part 2 – List of Audit Requirements

### 2.1 Senior Management Responsibility

#### 2.1.1 Corporate policy/Corporate principles

1.1.1 The senior management shall draw up and implement a clear corporate policy. This shall consider as a minimum:

- customer focus
- environmental responsibility
- sustainability
- ethics and personnel responsibility
- product requirements (includes: product safety, quality, legality, process and specification).

The corporate policy shall be communicated to all employees.

1.1.2 The corporate policy shall have objectives specifying responsibilities and time-lines appropriate for the size and complexity of the organization.

#### 2.1.2 Corporate structure

1.2.4 KO N° 1: The senior management shall ensure that employees are aware of their responsibilities related to packaging material safety and quality and that mechanisms are in place to monitor the effectiveness of their operation. Such mechanisms shall be clearly identified and documented.

## // 2.1 Senior Management Responsibility

### 2.1.4 Management review

- 1.4.1 Senior management shall ensure that the quality and packaging material safety management systems are reviewed at least annually or more frequently if changes occur. Such reviews shall contain, at least, results of audits, customer feedbacks, process compliance and product conformity, status of preventive and corrective actions, quality and product safety policy and objectives, follow-up actions from previous management reviews, changes that could affect the packaging material safety and quality management systems and recommendations for improvement.

> 2	List of Audit Requirements
> 2.1	Senior Management Responsibility
> 2.1.1 DP1.1 2-1/1 V1	Evaluation of commitment on Product Safety Culture aspects

ALL CLARIFICATIONS >

## CLARIFICATION ON PART 2 – 1 SENIOR MANAGEMENT RESPONSIBILITY

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### 2.1.1 Evaluation of commitment on Product Safety Culture aspects

Product Safety Culture is a common term defined as: “shared values, beliefs and norms that affect mindset and behavior toward product safety in, across and throughout an organization”.

Elements of product safety culture are those elements of the quality and product safety management which the senior management of a company may use to drive the product safety culture within the company. These shall include as a minimum:

- Communication about product safety policies and responsibilities,
- Training,
- Employee feedback on product safety related issues,
- Performance measurement.

These Product safety culture elements are already addressed through various requirements in the IFS PACsecure checklist, as product safety culture refers to people (employees), awareness, communication, training and continuous improvement.

The introduction of the new terminology is intended to encourage the senior management to consciously deal with the concept of the product safety culture. For this purpose, it is required that the senior management includes a clear committing statement on product safety culture in its corporate policy and to evaluate regularly the objectives and measures derived from it in the management review.

- Corporate policy (1.1.1), objectives (1.1.2) and commitment (1.2.4 KO N° 1): Senior management develops, implements and maintains corporate policy (product safety responsibilities, training, employee feedback on product safety issues)
- Management review (1.4.1): Regular review of the quality and product safety management system (results of audits, customer feedback, status of preventive and corrective measures, etc.)

Auditors are required to evaluate the inclusion of product safety culture aspects as laid down above at the respective company and score it accordingly, starting 1<sup>st</sup> of January 2021.

## Part 2 – List of Audit Requirements

### 2.2 Quality and Packaging Material Safety Management System

#### 2.2.2 Packaging Material Safety Management

##### 2.2.2.3 Hazard analysis and risk assessment

2.2.3.5 Conduct a hazard analysis and risk assessment for each step  
An assessment shall be available of all physical, chemical and biological hazards that may reasonably be expected.

2.2.3.5.1 The hazard analysis shall demonstrate the motivation if a hazard is a risk, taking into account the likelihood of harm to the consumer and the potential severity of damage (effect, potential consequences).

> 2	List of Audit Requirements
> 2.2	Quality and Packaging Material Safety Management System
> 2.2.2	Packaging Material Safety Management
> 2.2.2.3	Hazard analysis and risk assessment
> 2.2.2.3.5.1	About hazard analysis and risk assessment
DP1.1 2-2.2.3.5/1 V1	

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## CLARIFICATION ON PART 2 – 2 QUALITY AND PACKAGING MATERIAL SAFETY MANAGEMENT SYSTEM

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### 2.2.2.3.5.1 About hazard analysis and risk assessment

The hazard analysis and risk assessment must include allergens as one of the hazards to be assessed.

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## Part 2 – List of Audit Requirements

### 2.4 Planning and production process

#### 2.4.2 Specifications and formulas/configurations

##### 2.4.2.1 Specifications and other legally required documentation

4.2.1.1 Specifications or other legally required documentation shall be available and in place for all finished products. They shall be up to date, unambiguous and be in compliance with legal and customer requirements.

> 2	List of Audit Requirements
> 2.4	Planning and Production Process
> 2.4.2	Specifications and formulas/configurations
> 2.4.2.1	Specifications and other legally required documentation
> 2.4.2.1.1.1	About critical information
DP1.1 2-4.2.1.1/1 V1	

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## CLARIFICATION ON PART 2 – 4.2.1 SPECIFICATIONS AND OTHER LEGALLY REQUIRED DOCUMENTATION

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### 2.4.2.1.1.1 About critical information

The finished products shall have specifications that must be in compliance with legal and customer requirements (see 4.2.1.1), including product requirements and critical information accordingly, if applicable.

Note that product requirements definition comprises: “product safety, product quality, product legality, process and specification” (see IFS PACsecure Standard, Part 2, Annex 1: Glossary/definition list, p. 123).

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## Part 2 – List of Audit Requirements

### 2.4 Planning and production process

#### 2.4.4 Purchasing

##### 2.4.4.1 General purchasing

4.4.1.5 The purchased products shall be checked in accordance with the existing specifications or other legally required documentation. The schedule of these checks shall, as a minimum, take into account the following criteria; product requirements, supplier status (according to its assessment) and impact of the purchased products on the finished product. If mentioned in the specifications or other legally required documentation additional required topics shall be checked.

4.4.1.6 The purchased services shall be checked in accordance with the existing specifications or other legally required documentation. The schedule of these checks shall at least take into account the following items: service requirements, supplier status (according to its assessment) and impact of the service on the finished product.

> 2	List of Audit Requirements
> 2.4	Planning and Production Process
> 2.4.4	Purchasing
> 2.4.4.1	General purchasing
> 2.4.4.1.1	About supplier status and exceptional situations
DP1.1 2-4.4.1/1 V1	

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## CLARIFICATION ON PART 2 – 4.4.1 GENERAL PURCHASING

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### 2.4.4.1.1 About supplier status and exceptional situations

In exceptional situations (e.g.: emergency situations), where the supplier status is not available, the acceptance procedure of incoming purchased products or purchased services described in 4.4.1.5 and 4.4.1.6 shall adequately address the missing status by increased frequency and scope of product testing. The exceptional situation shall be justified and documented.

If the supplier status is a customer requirement, the exceptional situation shall be notified before commissioning.

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## Part 2 – List of Audit Requirements

### 2.4 Planning and Production Process

#### 2.4.15 Transport

4.15.7 Where a company hires a third-party transport service provider, all the requirements specified within section 4.15 shall be clearly defined in the respective contract or the service provider shall be subject to IFS Logistics requirements.

> 2	List of Audit Requirements
> 2.4	Planning and Production Process
> 2.4.15	Transport
> 2.4.15.7.1 DP1.1-2-4.15.7/1 V1	How to control parcel service providers if used for transportation of products?

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## CLARIFICATION ON PART 2 – 4.15 TRANSPORT

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### 2.4.15.7.1 How to control parcel service providers if used for transportation of products?

If the company decides that its products can be send via parcel service it shall ensure that the integrity and safety of the product is not compromised during the whole distance and that general terms and conditions are respected. The company shall conduct a risk assessment and implement controls based on a “worst case scenario”.

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## Part 2 – List of Audit Requirements

### 2.5 Measurements, analysis, improvements

#### 2.5.3 Process validation and control

- 5.3.2 In circumstances where the control of process and working environment parameters (temperature, time, pressure, chemical properties etc.) is essential to ensure the product requirements, such parameters shall be monitored and recorded continuously and /or at appropriate intervals.
- 5.3.3 All rework operations shall be validated, monitored and documented. These operations shall not affect the product requirements.

#### 2.5.6 Product analysis

- 5.6.1 There shall be procedures ensuring that all specified product requirements are met, including legal requirements and specifications. Chemical, physical and microbiological analysis required for that purpose shall be performed internally and/or subcontracted.

#### 2.5.7 Product quarantine (blocking/hold) and product release

- 5.7.1 A procedure shall be in place, based on hazard analysis and assessment of associated risks, for the quarantine (blocking / hold) and release of all raw materials, semi-processed and finished products and wrapping materials. The procedure shall ensure that only products and materials conforming to product requirements are converted and dispatched.

## // 2.5 Measurements, Analysis, Improvements

### 2.5.10 Management of non-conformities and non-conforming products

5.10.1 A procedure shall exist for the management of all non-conforming raw materials, semi-finished and finished products, converting equipment and wrapping materials. This shall include, as a minimum:

- isolation/quarantine procedures
- hazard analysis and assessment of associated risks
- identification (e.g. labeling)
- decision about the further use (e.g. release, rework/post treatment, blocking, quarantine, rejection/disposal).

> 2	List of Audit Requirements
> 2.5	Measurements, Analysis, Improvements
> 2.5.1 DP1.1 2-5/1 V2	About control of packaging printed with critical information, misprinting, mixing and rework

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## CLARIFICATION ON PART 2 – 5 MEASUREMENTS, ANALYSIS, IMPROVEMENTS

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### 2.5.1 About control of packaging printed with critical information, misprinting, mixing and rework

#### a. Control in processes

Related to the requirement 5.3.2, the company must define the control of processes essential to ensure product compliance; therefore, the start-up control and regular controls during production processes shall consider as minimum aspects like:

- Handling of products in start-up processes and samplings in production test to avoid mixing
- Verifications related to critical information printed
- Monitoring of process deviations and/or failures that can lead a final non-conforming product, e.g.: misprinting, mixing

Also, the requirement 5.3.3 states that rework operations shall not affect the product requirements; hence, the company must implement proper controls to manage these operations and avoid deviations and/or failures (e.g. misprinting, mixing) that can compromise product compliance.

#### b. Control of products

About product analysis, as is written in the requirement 5.6.1, the company shall ensure that all specified product requirements are met, including legal requirements and specifications. Therefore, the test plan shall include also aspects like control of critical information printed on packaging, and misprinting issues.

In addition, according to the requirement 5.7.1, the organization must have a procedure to ensure that only products and materials conform to product requirements are converted and dispatched, thus, the control of critical information printed, misprinting and mixing issues must be part of the product quarantine (blocking/hold) and product release procedure.

Finally, products with misprinting, mixing or any other non-conformity related to the fulfilment of product requirements shall be handled as non-conforming products, according to the procedure for the management of non-conforming products of the company (requirement related: 5.10.1).

## Part 2 – List of Audit Requirements

### 2.5 Measurements, analysis, improvements

#### 2.5.2 Site factory inspections

5.2.1 Factory inspections shall be planned and carried out (e.g. product control, hygiene, foreign material hazards, personnel hygiene and housekeeping). The frequency of inspections in every area (including outdoor areas) and every single activity shall be based on hazard analysis and assessment of associated risks and on the history of previous experience.

> 2	List of Audit Requirements
> 2.5	Measurements, analysis, improvements
> 2.5.2	Site factory inspections
> 2.5.2.1.1 DP1.1 2-5.2.1/1 V2	About the scope of the site inspections in relation to Product Defense Plan

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## CLARIFICATION ON PART 2 – 5.2 SITE FACTORY INSPECTIONS

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### 2.5.2.1.1 About the scope of the site inspections in relation to Product Defense Plan

The site inspections shall cover in addition to the infrastructure of the site, the operational aspects of personnel hygiene, hygiene of the process, the hazard analysis and risk assessment system and product defense, including the evaluation of the control measures.

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## Part 2 – List of Audit Requirements

### 2.5 Measurements, analysis, improvements

#### 2.5.9 Management of incidents, product withdrawal, product recall

5.9.1 A documented procedure shall be defined for management of incidents and of potential emergency situations that impact packaging material safety, legality and quality. This procedure shall be implemented and maintained. This includes as a minimum: the nomination and training of a crisis team, an alert contact list, sources of legal advice (if necessary), contacts availability, customer information, and a communication plan, including information to consumers.

> 2	List of Audit Requirements
> 2.5	Measurements, analysis, improvements
> 2.5.9	Management of incidents, product withdrawal, product recall
> 2.5.9.1.1	About management of incidents
DP1.1 2-5.9.1/1 V1	

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## CLARIFICATION ON PART 2 – 5.9 MANAGEMENT OF INCIDENTS, PRODUCT WITHDRAWAL, PRODUCT RECALL

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### 2.5.9.1.1 About management of incidents

An incident is a “situation that might be, or could lead to, a disruption, loss, emergency or crisis”. The Incident Management comprises the processes defined by the company to achieve the aim of protecting the business against those incidents through an effective response.

Some examples of what can be expected as an incident that may affect the quality, legality or safety of the product are:

- Natural events (e.g.: earthquakes, hurricanes, floods)
- Emergency situations (fires, building collapse, chemical spills)
- Supply chain interruption
- Resource depletion
- Supplies shortage (e.g.: lack of suppliers and/or materials)
- Product contamination (e.g.: raw materials, semi-finished products, finished products, packaging materials)

The examples listed above are incidents that could affect product/processes requirements, and therefore customer and consumers. However, the company should consider not only the impact for consumers and customers, because all these events also could have an impact in the relationship with other stakeholders, reputation and confidence gained, corporate image, and in the business continuity.

Read more on next page

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## // 2.5.9.1.1 About management of incidents

About management of incidents, some examples of what to check and what should be asked are described below:

Requirement 5.9.1	What to check?/What should be asked?
<p>A documented procedure shall be defined for management of incidents and of potential emergency situations that impact product/packaging material safety, legality and quality.</p>	<ul style="list-style-type: none"> <li>• What are the incidents and emergency situations identified by the company?</li> <li>• What is the impact of those incidents and emergency situations defined in products and processes regarding quality, legal and safety aspects?</li> <li>• What are the sources of information used to be aware/alert of new potential emergencies/incidents?</li> <li>• What are the actions defined to recover, resume and restore the activities in case of emergency/incidents described by the company occurs?</li> <li>• What are the actions defined to minimize the impact?</li> <li>• Are the responsibilities clearly defined in actions defined? &lt;incident management procedures&gt;</li> </ul>
<p>This procedure shall be implemented and maintained.</p>	<ul style="list-style-type: none"> <li>• How does the company evaluate that the procedure is implemented, adequate and effective?</li> <li>• Are corrective actions taken in case the procedure is not effective? &lt;exercises and tests&gt;</li> </ul>
<p>This includes as a minimum: the nomination and training of a crisis team, an alert contact list, sources of legal advice (if necessary), contacts availability, customer information, and a communication plan, including information to consumers.</p>	<ul style="list-style-type: none"> <li>• Who belongs to the crisis teams? &lt;phone list&gt;</li> <li>• Who is the person defined to initiate the incident management process? Is this person permanently available? How are the absences covered (vacations, sick leave, etc)?</li> <li>• Are the members of crisis team trained in topics related to incident management? &lt;training records&gt;</li> <li>• Who is informed when an incident occurs?</li> <li>• How are incidents managed? &lt;crisis management procedures&gt;</li> <li>• communication plan: definition of the internal and external communication (in the case of incidents, product withdrawal, product recall),</li> <li>• Who is allowed to report what to whom, and in what time? &lt;communication plan&gt;</li> </ul>

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## Part 2 – List of Audit Requirements

### 2.6 Product defense plan and external inspection

#### 2.6.1 Defense assessment

6.1.3 If legislation makes registration or on-site inspections necessary, evidence shall be provided.

#### 2.6.4 External Inspections

6.4.1 A documented procedure shall exist for managing external inspections and regulatory visits (if applicable). Relevant personnel shall be trained to execute the procedure.

> 2	List of Audit Requirements
> 2.6	Product defense plan and external inspection
> 2.6.1 DP1.1 2-6/1 V2	Clarification about the (non) applicability of requirements 6.1.3 and 6.4.1

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## CLARIFICATION ON PART 2 – 6 CLARIFICATION ABOUT THE (NON) APPLICABILITY OF REQUIREMENTS 6.1.3 AND 6.4.1

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### 2.6.1 Clarification about the (non) applicability of requirements 6.1.3 and 6.4.1

**6.1.3** If legislation makes registration or on-site inspections necessary, these shall be carried out and evidence shall be provided.

Clarification: This requirement is not applicable (N/A) if no product defense legislation exists in the country where the audit is done and where the products are sold.

**6.4.1** A documented procedure shall exist for managing external inspections and regulatory visits (if applicable). Relevant personnel shall be trained to execute the procedure.

Clarification: This requirement is not applicable (N/A) if no product defense legislation exists in the country where the audit is done and where the products are sold.

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## Part 2 – List of Audit Requirements

### 2.A1 ANNEX 1: Glossary/definitions list

Definitions which are not mentioned within the glossary can be found in relevant regulations and directives. In relation to the terms used within this document and PACsecure documents, the following definitions apply and shall be respected.

> 2	List of Audit Requirements
> 2.A1	ANNEX 1: Glossary/definitions list
> 2.A1.1	New and updated definitions
DP1.1 2-A1/1 V1	

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## CLARIFICATION ON PART 2 – ANNEX 1: GLOSSARY/ DEFINITIONS LIST

### 2.A1.1 New and updated definitions

To improve the understanding of the IFS PACsecure Standard, the following definitions have been updated [MODIFIED] or included [NEW]:

Term	Explanation
Packaging material [NEW]	<p>Any material used to:</p> <ul style="list-style-type: none"> <li>• Contain the product, which depends on the product's physical form and nature</li> <li>• Protect and prevent the product from mechanical damage due to the hazards of distribution</li> <li>• Preserve the product, to prevent or inhibit chemical changes, biochemical changes and / or microbiological spoilage</li> <li>• Inform and communicate about the product, e.g., legal requirements, product ingredients, usage, brand communication, etc.</li> <li>• Extend the shelf life or to maintain or improve the condition of the product (e.g., active food contact materials)</li> <li>• Monitor the condition of the packaged product or the environment surrounding the product (e.g., intelligent food contact materials).</li> <li>• Handling, delivery and presentation of products</li> </ul>
Primary packaging material [MODIFIED]	<p>The primary packaging material fulfils one or more of the following conditions:</p> <ul style="list-style-type: none"> <li>• It is in contact and/or intended to be in contact with the goods (e.g., food, cosmetics, household chemical, etc.)</li> <li>• It can transfer their constituents to the goods, and if it is removed, the quality, safety and legality of its content is affected</li> <li>• It is part of the consumer unit</li> </ul>
Secondary packaging material [MODIFIED]	<p>The secondary packaging material is the one used for grouping of a certain number of sales units whether the latter is sold as such to the customer or consumer or whether it serves only as a means to replenish product supply; it can be removed from the product without affecting its characteristics.</p>
Tertiary packaging material [MODIFIED]	<p>Packaging conceived to facilitate handling and transport of a number of sales units or grouped packagings to prevent physical handling and transport damage. Transport packaging does not include road, rail, ship and air containers.</p>

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## // 2.A1.1 New and updated definitions

Term	Explanation
Consumer unit [NEW]	Unit of the product intended to be sold to final users or consumers, which is available on the market, at the point of purchase.
Product safety culture [NEW]	<p>Shared values, beliefs and norms that affect mindset and behaviour toward product safety in, across and throughout an organization.</p> <p>Elements of product safety culture are those elements of the quality and product safety management which the senior management of a company may use to drive the product safety culture within the company.</p> <p>These shall include as a minimum:</p> <ul style="list-style-type: none"><li>• Communication about product safety policies and responsibilities</li><li>• Training</li><li>• Employee feedback on product safety-related issues</li><li>• Performance measurement.</li></ul>

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## Part 3 – Requirements for Accreditation Bodies, Certification Bodies and Auditors

### 3.2 Requirements for the Certification Bodies

#### 3.2.4 Certification bodies' responsibilities for IFS PACsecure Trainers and the IFS PACsecure Auditors

Certification bodies have the following responsibilities:

- The certification body is obliged to ensure compliance with ISO/IEC 17065 norm and the IFS framework agreement.
- To facilitate witness audits (by accreditation bodies and/or by Integrity Program).
- To ensure that at least one member of their staff is an IFS PACsecure trainer who has taken part in an IFS PACsecure Train-the-trainer course. The trainer is responsible for the in-house training of all auditors, intending to become IFS PACsecure auditors or who already are IFS PACsecure auditors. Persons intending to become IFS PACsecure trainers shall meet the requirements mentioned in 2.5.
- Note: for a certification body which is starting IFS activities, this in-house training can be organised by IFS, on request.
- To ensure that the auditor is competent for the scope of the audit and its execution and is able to access and to apply relevant laws and regulations, based on IFS and internal certification body's requirements; the certification body shall maintain these competences (continuous supervision by the certification body) and shall monitor audit execution by on-site witness audit. Every auditor shall be monitored by an IFS PACsecure (or IFS Food, IFS HPC or other GFSI recognized packaging material safety) on-site witness audit at least once every two (2) years, and the results of this witness audit shall be documented. The observer shall be an IFS PACsecure, IFS Food or IFS HPC approved auditor or shall follow the same rules as for trainers (see section 2.5).
- To maintain records of auditor competences.
- To ensure that no auditor has either acted against IFS rules, for example acting as a consultant, or has been active in and/or on behalf of the company being audited during the previous two (2) years. That is to say, during the certification process, no other commercial and/or personal relationships are permitted between the auditee and the auditor.

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### // 3.2.4 Certification bodies' responsibilities for IFS PACsecure Trainers and the IFS PACsecure Auditors

- To ensure that no auditor shall perform more than three (3) consecutive IFS PACsecure audits of the same production site (only applies for complete audits, whatever the time between them; follow-up and extension audits are not concerned by this rule).
- To ensure that all auditors have a valid contract with the certification body.
- To sign an audit order for each audit, this includes a statement accepting all the above-mentioned requirements.
- To organise a 2-day training session for IFS PACsecure auditors once a year for the purposes of sharing experience, calibration and updating knowledge of relevant legal requirements, etc. The IFS PACsecure trainer shall lead a part of the training course.
- To perform an on-site witness audit of an auditor during a product safety audit and/or an audit under ISO/IEC 17065 accreditation to ensure the auditor's competence (see glossary) before he/she has applied for the IFS examinations. The certification body shall state the date, the name of the audited company where the on-site witness audit took place, and the name of the observer in the IFS examination application file. The minutes of the on-site witness audit shall be provided on request to the IFS in English, French or German. The observer for the on-site witness audit of an auditor applying for IFS examination shall comply with the same requirements as the trainers (see section 2.5) or shall be an IFS PACsecure, IFS Food or IFS HPC auditor.
- To include the name of the observer in the Audit Portal when uploading the audit data, when it has scheduled specific on-site IFS witness audit(s) according to ISO/IEC 17065 on internal audits.

The certification body is responsible for choosing an auditor with the corresponding scope(s), language, competence(s), etc. for each IFS PACsecure audit.

> 3	Requirements for Accreditation Bodies, Certification Bodies and Auditors
> 3.2	Requirements for the Certification Bodies
> 3.2.4	Certification bodies' responsibilities for IFS PACsecure Trainers and the IFS PACsecure Auditors
> 3.2.4.1 DP1.1 3-2.4/1 V2	Clarifications about Witness Audits
> 3.2.4.2 DP1.1 3-2.4/2 V2	About IFS Yearly In-house Training: which way of training is allowed (e.g. webinars, face-to-face training, etc.)

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## CLARIFICATION ON PART 3 – 2.4 CERTIFICATION BODIES' RESPONSIBILITIES FOR IFS PACSECURE TRAINERS AND THE IFS PACSECURE AUDITORS

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### 3.2.4.1 Clarifications about Witness Audits

#### a) Initial Witness Audit:

The on-site Witness Audit before applying to IFS PACsecure Examination is the "Initial Witness Audit" which is part of the requirements to become an IFS PACsecure Auditor. The clarification of this process and a new approach is explained below:

**Initial Witness Audit process:** *The auditor who is witnessed shall be accompanied by an observer from the certification body during a complete audit in order to evaluate his / her competence. The observer shall not be part of the audit (as a team member).*

*The observer shall fulfil the same requirements as for trainers or shall be an IFS PACsecure auditor, IFS Food auditor or IFS HPC auditor.*

*This Witness Audit shall be a product safety audit and / or an audit under ISO/IEC 17065.*

**Note:** *The Witness Audit can either be performed before or after passing the exams.*

**Hence, for the latter, also an IFS audit can be used. In this case both, the auditor under observation (AUO) and the witnesser, have to cover the whole scope of the audit. The audit is uploaded with the witnesser as lead auditor as the "AUO" is not yet approved as IFS Auditor (inserted as "AUO" in the participants list).**

*On the application file of the auditor (sent afterwards to the IFS Offices), the certification body shall specify the name of the company, audit date and name of the person who observed the auditor. On request, the certification body shall be able to provide minutes of the Witness Audit.*

*(Text extracted from IFS PACsecure Standard, Part 2, Annex 1: Glossary/definitions list)*

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### // 3.2.4.1 Clarifications about Witness Audits

#### **b) On-site Witness Audit once every two (2) years:**

This is part of the requirements to maintain the qualification in IFS PACsecure, as is described in chapter 3.4. The requirements to execute this process is described in IFS PACsecure Standard, Part 2, Annex 1: Glossary/definitions list, "Witness Audit, to be performed every two (2) years, for IFS PACsecure Approved Auditors".

In both types of Witness Audits, the observer shall be approved for the language in which the auditor performs the audit.

## CLARIFICATION ON PART 3 – 2.4 CERTIFICATION BODIES' RESPONSIBILITIES FOR IFS PACSECURE TRAINERS AND THE IFS PACSECURE AUDITORS

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### 3.2.4.2 About IFS Yearly In-house Training: which way of training is allowed (e.g. webinars, face-to-face training, etc.)

One of the requirements of IFS PACsecure is the yearly two (2)-days In-house Training for IFS PACsecure Auditors. The purpose is sharing experience, calibration and updating knowledge of relevant legal requirements, among other relevant aspects related to the standard.

As an additional option to support the Certification Bodies in the development of IFS PACsecure in the market, IFS will allow the opportunity to execute the IFS Yearly In-house Training remotely for IFS PACsecure Auditors, but under the following conditions:

- The CB shall notify IFS about the execution of the training in a remote manner via email three weeks before the execution of the session.
- The session must have a duration of sixteen (16) hours, and it must be recorded.
- The system to be used shall allow sharing audio and video, so the participants can talk and interact with each other.
- The session shall be dedicated to IFS PACsecure only, and the content must include, at a minimum, the following contents: packaging-related legislation, hazard trends in packaging materials, standard requirements, audit practices, failures in reports and findings, exercises to calibrate criteria in IFS Scoring System
- The recorded session and attendance registration should be stored by the CB and shall be available at IFS request.



## Part 3 – Requirements for Accreditation Bodies, Certification Bodies and Auditors

### 3.3 Requirements for IFS PACsecure Auditors

#### 3.3.2 Requirements for new IFS PACsecure Auditors

##### 3.3.2.1 Requirements before applying for the IFS PACsecure Examinations

Before applying for IFS examinations, auditors shall have met the following requirements:

- They shall have signed a contract with the certification body (see ISO/IEC 17065 norm).
- They shall have participated at the IFS PACsecure in-house course organised by the certification body or the equivalent IFS training provided by IFS.
- They shall have submitted all the relevant information about their competence to the certification body.
- The certification body shall have observed and confirmed the professional qualification and competence of the auditors.

> 3	Requirements for Accreditation Bodies, Certification Bodies and Auditors
> 3.3	Requirements for IFS PACsecure Auditors
> 3.3.2	Requirements for new IFS PACsecure Auditors
> 3.3.2.1	Requirements before applying for the IFS PACsecure Examinations
> 3.3.2.1.1	Additional approach for non-exclusive auditors
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## CLARIFICATION ON PART 3 – 3.2.1 REQUIREMENTS BEFORE APPLYING FOR THE IFS PACSECURE EXAMINATIONS

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### 3.3.2.1.1 Additional approach for non-exclusive auditors

It is possible for applicants to apply directly at IFS for IFS Examination. The applicant has to fulfill all requirements as laid down in Part 3 of the PACsecure Standard v.1.1.

The CV has to be handed in with all confirmed information via the auditor portal. The IFS is responsible for a desk check of the CV to confirm the registration including the confirmed scopes.

After having passed the written exam the auditor can apply at certification bodies and can work for more than one CB. For these auditors the CB shall check and confirm the CV in the database.

When the first Witness Audit (“Initial Witness Audit”) of the auditor is confirmed to IFS by the CB the auditor will be activated by IFS as IFS Auditor.

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## Part 3 – Requirements for Accreditation Bodies, Certification Bodies and Auditors

### 3.3 Requirements for IFS PACsecure Auditors

#### 3.3.2 Requirements for new IFS PACsecure Auditors

##### 3.3.2.2 General requirements for auditors when applying for IFS PACsecure Examinations

Candidates applying for qualification as IFS PACsecure auditors shall meet the following requirements and provide evidence with the application documents. An outline CV is available from IFS.

#### a) Education in the food and packaging material sector

1) A food or packaging-related university degree (bachelor's and/or master's degree equivalents) and two (2) years professional experience in the packaging material industry in relation to packaging material production activities (quality, production, R & D, ...).

or

2) If the candidate started directly as an auditor after completing his/her food or packaging related university degree then the candidate shall have five (5) years professional audit experience in the packaging related industry.

or

3) If the candidate has a university degree but not a food or packaging-related one, (bachelor's and/or master's degree equivalents) then the candidate shall have five (5) years professional experience in the packaging material industry—in relation to packaging material production activities (quality, production, R & D, ...).

or

4) Professional education in food or packaging processing (high degree) and five (5) years professional experience in the packaging material industry—in relation to packaging material production activities (quality, production, R & D, ...).

### // 3.3.2.2 General requirements for auditors when applying for IFS PACsecure Examinations

#### **b) General audit experience**

A minimum of ten (10) complete audits shall be performed by the auditor in the packaging material processing industry during the previous two years. The audits shall have been carried out in different companies.

#### **c) Food/Packaging hygiene (including HACCP/risk assessment) training**

Qualified training on the basis of the Codex General Principles for Food Hygiene.

#### **d) Training in auditing techniques based on Quality Management System or Packaging**

Material Safety Management System

Duration: one week/40 hours or equivalent.

#### **e) Specific and practical knowledge for product scopes auditors apply for (see ANNEX 1 for product scopes)**

At least two (2) years professional experience in the packaging material industry in relation to packaging activities, for each applied product scope.

or

At least ten (10) packaging safety audits and/or second party audits including quality and packaging material safety investigations with traceable origin and confirmed by the retailer or by the industry, per product scope. Ten (10) witness audits during IFS PACsecure audits, as observer, are also accepted to qualify the observer on the product scope. Audits shall have been carried out in different production sites.

### // 3.3.2.2 General requirements for auditors when applying for IFS PACsecure Examinations

#### f) Language

If the auditor wishes to perform audits in language(s) different from his/her mother language, he/she shall be able to provide evidence for speaking fluently this/these other language(s).

#### g) IFS PACsecure in-house training

IFS PACsecure in-house training materials shall be based on the materials provided by IFS. The auditor shall have taken part in the in-house training (covering IFS, packaging-related legislation, general hygiene requirements, GMP) undertaken by an authorised IFS PACsecure trainer and organised by the certification body. The minimum duration shall be two (2) days.

IFS is responsible for the technical validation of the auditors' application files before they take part in IFS examinations. If the auditor's CV does not meet the above-mentioned requirements, IFS may reject the Auditor's examination application. If the auditor does not show sufficient evidence for the product scopes he/she is applying for, IFS may reject the applications for the product scopes concerned.

> 3	Requirements for Accreditation Bodies, Certification Bodies and Auditors
> 3.3	Requirements for IFS PACsecure Auditors
> 3.3.2	Requirements for new IFS PACsecure Auditors
> 3.3.2.2	General requirements for auditors when applying for IFS PACsecure Examinations
> 3.3.2.2.1 DP1.1 3-3.2.2/1 V1	Which evidence should be provided to be approved for languages in addition to the native languages?
> 3.3.2.2.2 DP1.1 3-3.2.2/2 V2	IFS In-house Training
> 3.3.2.2.3 DP1.1 3-3.2.2/3 V1	Specific training program for "Auditors in Progress (AIP)"
> 3.3.2.2.4 DP1.1 3-3.2.2/4 V2	GFSI online written exams
> 3.3.2.2.5 DP1.1 3-3.2.2/5 V1	Recognition of second-party audits for the general audit experience and/or for product scope approval required by the auditor qualification requirements
> 3.3.2.2.6 DP1.1 3-3.2.2/6 V1	Summary of requirements for reviewers, auditor trainers and auditors in IFS PACsecure

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## CLARIFICATION ON PART 3 – 3.2.2 GENERAL REQUIREMENTS FOR AUDITORS WHEN APPLYING FOR IFS PACSECURE EXAMINATIONS

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### 3.3.2.2.1 Which evidence should be provided to be approved for languages in addition to the native language?

The following evidence is accepted by the IFS Offices to validate another language on the auditor's CV:

- Acceptance of language certificates comparable to the CEFR (Common European Framework of Reference for Languages) level B2 and higher

or

- Two (2) years work experience in the packaging sector in the respective country

or

- At least ten (10) performed audits in the respective language of the country (trainee audits are not accepted), that includes reporting in this language without a translator

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## CLARIFICATION ON PART 3 – 3.2.2 GENERAL REQUIREMENTS FOR AUDITORS WHEN APPLYING FOR IFS PACSECURE EXAMINATIONS

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### 3.3.2.2.2 IFS In-house Training

The required initial IFS In-house Training can also be fulfilled by the equivalent two (2) days of “IFS PACsecure Auditor Training” provided by IFS.

The “IFS PAC secure Auditor Training” is available via eLearning (training course and exam). The face-to-face course is on request.

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## CLARIFICATION ON PART 3 – 3.2.2 GENERAL REQUIREMENTS FOR AUDITORS WHEN APPLYING FOR IFS PACSECURE EXAMINATIONS

### 3.3.2.2.3 Specific training program for “Auditors in Progress (AIP)”

If an auditor has no own auditing experience, a new adaption of topic 3.2.2 b) of the IFS PACsecure Standard 1.1 is possible, if the candidate meets the requirements of 3.2.2 a).

In this case the trainee can attend the exam session before participating in an adjusted program for gaining audit experience.

The rules for auditors described in the standard are not affected and shall be fulfilled.

#### Steps of “Auditors in Progress (AIP)” program

- **Step 1: Curriculum Vitae and further qualification:** A complete CV (based on IFS Auditor CV template) shall be sent to IFS. Information concerning education, work experience (product scope competences), food/packaging in GMP/hygiene training (including HACCP/risk assessment) and training of auditing techniques shall be provided.
- **Step 2: IFS PACsecure In-house Training and exam:** After the IFS PACsecure In-house Training (or the IFS PACsecure Auditor Training provided by IFS), and if the written exam is passed, the candidate becomes an “IFS Auditor in Progress”.
- **Step 3: Auditing experience 1 to 9:** The AIP must participate in a “witnessing program” as is described in the chart below.

Witnessing program		
N° of audits	Tasks	Possible audit types
Audit 1–3	Shadow Observer	GFSI-Recognised Certification Programs (scope M), or IFS Global Markets Program in packaging scope, or second party audits in packaging material processing industry
Audit 4–6	Active participation in the audits under supervision and responsibility of an experienced lead auditor	GFSI-Recognised Certification Programs (scope M), or IFS Global Markets Program in packaging scope, or second party audits in packaging material processing industry

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## // 3.3.2.2.3 Specific training program for “Auditors in Progress (AIP)”

N° of audits	Tasks	Possible audit types
Audit 7–9	Active participation in the IFS Certification Audit under supervision and responsibility of an IFS Auditor	IFS PACsecure Audit, not necessarily for the related product scope

## Rules to apply the “witnessing program”:

- The supervising lead auditor and observer who is witnessing the AIP during the auditing part of the program and the AIP shall be a member of the same CB. This ensures that the improvement of the AIP can be followed up.
- The second party audits in packaging material processing industry must cover topics of IFS Global Markets Program intermediate level (Food/HPC/Packaging) and must have a minimum duration of one (1) day.
- Each audit shall have been carried out in different production sites.
- For each of these audits under observation, the respective templates for the Auditor in Progress program shall be provided to IFS. The audit number (1–9) shall be documented in the report (see IFS website: [www.ifs-certification.com](http://www.ifs-certification.com)). All these templates need to be written in English and shall not only include the evaluation grade, but also the descriptive review of the topic. Only one AIP is allowed to attend at these training audits at the same time.
- Audits 1–3 can be performed before to achieve step 2.
- Audits 4–10 can only be performed after passed exams.
- The IFS PACsecure Audit Reports (audits 4–10) shall include the names of the observers
- Audits 7–9 must be IFS Certification Audits.
- The observer, auditor or audit team, shall never be separated during the audit.
- Audits 1–9 can be counted for scope extensions and can be performed in any product scope.
- The auditing experience must be gained within two years after the passed exams.

- **Step 4: Witness Audit in the product and tech scopes of the Auditor in Progress:** The 10<sup>th</sup> audit is the final Witness Audit, after audits number 4–9 have been performed. The AIP shall conduct the 10<sup>th</sup> audit on his/her own, witnessed by an experienced IFS Auditor who performed at least ten (10) IFS Audits. The rules of Witness Audits for IFS Auditors apply (see glossary of IFS respective Standard). The observer witnessing the AIP needs to cover all scopes (product scopes) of the audit, as he has the responsibility for this audit. The report of the Witness Audit shall be documented in an assessment template provided by IFS (see IFS website: [www.ifs-certification.com](http://www.ifs-certification.com)). The audit scope shall fit with AIP’s scopes of competencies.

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### // 3.3.2.2.3 Specific training program for “Auditors in Progress (AIP)”

- **Step 5: Release of “Auditor in Progress”:** If the Witness Audit was conducted successfully, the certification body will officially release the auditor and inform IFS. The completed CV and respective audit templates shall be sent to IFS and IFS needs to approve and activate the auditor in the database. Only after this activation date, this newly approved IFS Auditor is allowed to perform IFS Audits on his own.

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## CLARIFICATION ON PART 3 – 3.2.2 GENERAL REQUIREMENTS FOR AUDITORS WHEN APPLYING FOR IFS PACSECURE EXAMINATIONS

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### 3.3.2.2.4 GFSI online written exams

All candidates who comply with the requirements for new IFS PACsecure auditors must take part in the IFS PACsecure examination as part of the requirements to be approved as IFS PACsecure Auditor (see IFS PACsecure Standard, part 3, chapter 3.3)

The IFS PACsecure examination process only considers the IFS PACsecure written exam provided by IFS, due to the GFSI scope knowledge exam is not applicable anymore.

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## CLARIFICATION ON PART 3 – 3.2.2 GENERAL REQUIREMENTS FOR AUDITORS WHEN APPLYING FOR IFS PACSECURE EXAMINATIONS

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### 3.3.2.2.5 Recognition of second-party audits for the general audit experience and/or for product scope approval required by the auditor qualification requirements

To obtain the recognition of second-party audits as valid for the general audit experience and/or for product scope approval required by the auditor qualification requirements, the following route applies:

- a. The certification body must send the following information of the second-party audits for which are applying for the recognition:
  - The audit checklist used
  - The type of scoring applied
  - The duration of the audit on-site
- b. IFS will verify the fulfilment of the criteria for the recognition of second-party audits with the information provided by the Certification Body. The criteria defined for the recognition are the following:
  - The audit checklist shall cover all the GFSI Benchmarking requirements requested on part III, for the “Production of Food Packaging” scope
  - The scoring system must be graduated (not only yes/no answers)
  - The audit on-site shall have a minimum duration of one working day (8 h)
- c. If the criteria defined are met, the audits will be recognized as valid for general audit experience and/or for product scope approval and the certification body will receive written confirmation of this recognition.

## CLARIFICATION ON PART 3 – 3.2.2 GENERAL REQUIREMENTS FOR AUDITORS WHEN APPLYING FOR IFS PACSECURE EXAMINATIONS

### 3.3.2.2.6 Summary of requirements for reviewers, auditor trainers and auditors in IFS PACsecure

Requirements NOTE: exceptional benefits for business development are written in blue	Re-viewer <sup>1</sup>	Trainer	IFS Food/Log/HPC Auditors AND GFSI Scope I auditors	GFSI Scope I auditors (ISO 17065)	Any other candidate	AIP
<b>Education – Four (4) possible options</b>	<b>Mandatory requirement per role</b>					
<b>Option 1:</b> A food or packaging-related university degree + two (2) years professional experience in the packaging material industry <sup>2</sup>	Yes	Yes	Yes	Yes	Yes	Yes
<b>Option 2:</b> A food or packaging-related university degree + five (5) years professional <u>audit experience</u> in the packaging related industry						
<b>Option 3:</b> A university degree but NOT food or packaging-related + five (5) years professional experience in the packaging material industry <sup>2</sup>						
<b>Option 4:</b> Professional education in food or packaging processing + five (5) years professional experience in the packaging material industry <sup>2</sup>						
<b>General audit experience</b>	<b>Mandatory requirement per role</b>					
A minimum of ten (10) complete audits in the packaging material processing industry during the previous two (2) years <sup>5</sup>	Yes <sup>3</sup>	Yes	Yes	Yes	Yes	<b>AIP Route<sup>4</sup></b>
<b>Trainings</b>	<b>Mandatory requirement per role</b>					
Food/Packaging hygiene (including HACCP/risk assessment) training	Yes	Yes	Yes	Yes	Yes	Yes
Training in auditing techniques based on Quality Management System or Packaging Material Safety Management System (40 hours)	No	Yes	Yes	Yes	Yes	Yes

Read more on next page

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## // 3.3.2.2.6 Summary of requirements for reviewers, auditor trainers and auditors in IFS PACsecure

Requirements NOTE: exceptional benefits for business development are written in blue	Re-viewer <sup>1</sup>	Trainer	IFS Food/Log/HPC Auditors AND GFSI Scope I auditors	GFSI Scope I auditors (ISO 17065)	Any other candidate	AIP
<b>Product scope – Two (2) possible options</b>	<b>Mandatory requirement per role</b>					
<b>Option 1:</b> Two (2) years of professional experience in the packaging material industry <sup>2</sup> related to the scope for which the auditor is applying. <b>Option 2:</b> Ten (10) audits <sup>5</sup> in the packaging material processing industry related to the scope for which the auditor is applying, during the previous two years	No	No	Option 1 <b>OR</b> five (5) audits in option 2	Option 1 <b>OR</b> five (5) audits in option 2	Option 1 <b>OR</b> five (5) audits in option 2	Option 1
<b>IFS PACsecure in-house training<sup>6</sup></b>	<b>Mandatory requirement per role</b>					
IFS Auditor Training via eLearning	Yes	Yes	Yes	Yes	Yes	Yes
<b>IFS Examination process</b>	<b>Mandatory requirement per role</b>					
IFS PACsecure written examination (online)	No	No	Yes	Yes	Yes	Yes
<b>Initial Witness Audit<sup>7</sup> – Two (2) possible options</b>	<b>Mandatory requirement per role</b>					
<b>Option 1:</b> Through a product safety audit (packaging materials, ISO/IEC 17065). <b>Option 2:</b> During an IFS PACsecure audit.	No	No	<b>New option<sup>8</sup></b>	<b>New option<sup>9</sup></b>	Yes	<b>AIP Route<sup>4</sup></b>

- (1) Reviewer responsibilities are described in the IFS PACsecure Standard (see: Part 2, Annex 1: Glossary/ definitions, “Reviewer”; and Part 3, chapter 2.3, “Certification decision”)
- (2) In relation to packaging material production activities (quality, production, R & D, ...)
- (3) To have attended (as auditor or observer) at ten (10) complete audits (related to other packaging material safety schemes) in the last five (5) years
- (4) Please, review the IFS PACsecure Doctrine no. 3.3.2.2.3 “Specific training program for “Auditors in Progress (AIP)”
- (5) The packaging safety audits shall have been carried out in different production sites. Second-party audits can be recognized as valid by IFS (please, review the IFS PACsecure Doctrine No. 3.3.2.2.5 “Recognition of second-party audits for the general audit experience and/or for product scope approval required by the auditor qualification requirements”)
- (6) Please, review the IFS PACsecure Doctrine No. 3.3.2.2.2 “IFS In-house Training”
- (7) Please, review the IFS PACsecure Doctrine No. 3.2.4.1 “Clarifications about Witness Audits”
- (8) IFS recognizes the last witness audit done in the IFS related standard
- (9) IFS recognizes the latest witness audit done in the GFSI scope M from the year before the application as an Initial Witness Audit. Therefore, only the respective Witness Audit Report must be uploaded in the IFS Auditor Portal

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## Part 3 – Requirements for Accreditation Bodies, Certification Bodies and Auditors

### 3.3 Requirements for IFS PACsecure Auditors

#### 3.3.4 Maintenance of auditors' qualification

The auditor cannot perform IFS PACsecure audits anymore when his/her IFS PACsecure auditor certificate expires. The certification body is responsible to maintain auditor's IFS approval so that there are no gaps during the auditor approval.

Auditors' approval shall be re-assessed before end of validity of the auditor certificates. For maintaining their approval, auditors shall fulfil the following requirements:

- have performed a minimum number of ten (10) IFS PACsecure audits (5 audits per year),
- have been trained internally by the certification body on packaging-related legislation, Standard requirements, audit practices, etc. (2 days per year),
- be monitored by an IFS on-site witness audit (once every two years) by the certification body. This audit can be performed at any time during the year of end of validity of auditor's certificate. Witness assessments performed by accreditation bodies during IFS PACsecure audits are accepted as witness audits,
- have taken part in an IFS PACsecure calibration training course (subsequent to passing the initial examination, the first mandatory calibration training shall be successfully completed in the second calendar year following the date on which the initial examination was successfully completed. Then, the re-approval shall be managed every two (2) calendar years, based on the same rule).

[...]

## // 3.3.4 Maintenance of auditors' qualification

> 3	Requirements for Accreditation Bodies, Certification Bodies and Auditors
> 3.3	Requirements for IFS PACsecure Auditors
> 3.3.4	Maintenance of auditors' qualification
> 3.3.4.1 DP1.1 3-3.4/1 V1	Do certification bodies need to send an updated CV to IFS Offices for the re-approval process?
> 3.3.4.2 DP1.1 3-3.4/2 V2	Non-exclusive auditor qualification maintenance
> 3.3.4.3 DP1.1 3-3.4/3 V1	Further rules and explanations concerning the non-exclusive approach
> 3.3.4.4 DP1.1 3-3.4/4 V1	About the minimum number of audits per year
> 3.3.4.5 DP1.1 3-3.4/5 V1	Language of observers during IFS witness audits

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## CLARIFICATION ON PART 3 – 3.4 MAINTENANCE OF AUDITORS' QUALIFICATION

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### **3.3.4.1 Do certification bodies need to send an updated CV to IFS Offices for the re-approval process?**

Yes, certification bodies shall send to IFS Offices an updated CV of each auditor when registering for the calibration training course.

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## CLARIFICATION ON PART 3 – 3.4 MAINTENANCE OF AUDITORS' QUALIFICATION

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### 3.3.4.2 Non-exclusive auditor qualification maintenance

In case of a non-exclusive auditor he/she is responsible to maintain his/her IFS Approval. The requirements for re-assessment of the auditor's approval are in general the same as for exclusive auditors. For maintenance of approval it is necessary to have participated in a two (2) days In-house Training with each CB and to be monitored by an IFS On-site Witness Audit at least once every two (2) years by each CB the non-exclusive auditor is linked to.

The first on-site witness audit for a CB shall be performed to link the non-exclusive auditor to a CB. This can be any IFS standard audit the non-exclusive auditor is approved for.

## CLARIFICATION ON PART 3 – 3.4 MAINTENANCE OF AUDITORS' QUALIFICATION

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### 3.3.4.3 Further rules and explanations concerning the non-exclusive approach

In general loan agreements for individual audits and IFS-Working-Group Agreements remain unchanged, but loan agreements are not possible for non-exclusive auditors.

Each auditor can change his status between exclusive/non-exclusive status (and vice versa), concerned CBs will be notified automatically by IFS for every switch between the approaches.

The program "Auditor in Progress" is only possible for exclusive auditors but not for non-exclusive auditors.

A non-exclusive auditor cannot take over a position of responsibility regarding IFS in the CBs (e.g. TTT, IFS responsible, contact person for IFS).

In general these new rules do not imply any changes for auditors who work exclusively with one CB.

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## CLARIFICATION ON PART 3 – 3.4 MAINTENANCE OF AUDITORS' QUALIFICATION

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### 3.3.4.4 About the minimum number of audits per year

As an exceptional case, IFS will recognize as valid the audits in other recognized GFSI schemes in packaging related scope as long as two (2) of these ten (10) audits are executed in IFS PACsecure (at least one (1) IFS PACsecure Audit must be executed per year).

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## CLARIFICATION ON PART 3 – 3.4 MAINTENANCE OF AUDITORS' QUALIFICATION

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### **3.3.4.5 Language of observers during IFS witness audits**

During the initial witness audit and also in the witness audit to be performed every 2 (two) years to maintain auditor approval, the observer shall be approved for the language in which the auditor performed the audit.

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## Part 4 – Reporting, auditXpressX™ Software and IFS Audit Portal

### 4.1 Reporting

#### 4.1.1 Audit overview

The first part of the audit report shall contain the following general information:

##### **Audit details**

The **cover page** of the audit report shall include:

- name and address of the certification body
- the logo of the certification body
- the certification body's accreditation details
- name of the audited company or site
- date of the audit

These first pages shall give a summary of the most important audit report items and shall include:

- name and address of the audited site
- name and address of the company (if headquarters)
- EAN. UCC Global Location Number, if available
- COID, as defined in the IFS Portal
- audit date (in case of a follow-up audit the date of the follow-up audit shall additionally be defined)
- time of the audit
- previous audit date
- the name of the certification body and the auditor who performed the previous audit
- details of the version of the Standard
- audit scope (mandatory detailed descriptions of processes/products)
- numbers of product scopes

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## // 4.1.1 Audit overview

- list of key personnel present at audit and, if applicable consultant present at audit
- name of the lead auditor
- if applicable, additional name of the co-auditor
- if applicable, name of the auditor trainee
- **if applicable, name of the observer for this audit**
- **if applicable, name of the translator for this audit**
- result of the audit (in case of a follow-up audit, to specify that a follow-up audit has taken place and that the Major non-conformity has been solved)
- company profile: some compulsory general information about the company shall be provided, as follows:
  - The year of construction of the plant
  - The registration numbers of the company by authorities if available and/or existing (and GS1 number, if available)
  - The COID (IFS identification code number), in case of renewal audit
  - When the last investment was made in production, product-oriented investments concerning quality and safety (construction changes, machines). Specify the kind of investment made in production area
  - The name and contact data (phone/fax/e-mail) of the contact person in case of emergency (e.g. withdrawal/recall)
  - Product groups and products per group produced in the company. Also, indicate if products are food contact packaging materials and/or non-food contact packaging materials, according their intended use.
  - Complete view of the company's processes
  - If the audited company also has trade products (already processed), specify the kinds products
  - How many employees are there, listed according to full-time and part-time workers (own employees, external companies), shift work
  - The number and names of the sub-companies (sites) of the company (where are they situated, if they are IFS certified), precision about names and kinds of sub-contracted part(s) of the process
  - The site area of the plant in square meters
  - State if the company fulfils the requirements about use of IFS logo, as defined in IFS PACsecure audit protocol (Part 1)

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## // 4.1.1 Audit overview

- If the certification body has decided to decrease audit duration (see rules in chapter 5.3 of audit protocol), explanations about the reasons for decreasing
- If the site is certified according to other schemes, specify the schemes' names
- If there are seasonal breaks in production process, please specify time frame
- further explanations regarding scoring and frequency
- below the company profile: name of the person in charge of assessing the report (reviewer).

> 4	Reporting, auditXpressX™ Software and IFS Audit Portal
> 4.1	Reporting
> 4.1.1	Audit overview
> 4.1.1.1	Additional information to be provided in company profile
DP1.1 4-1.1/1 V1	

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## CLARIFICATION ON PART 4 – 1.1 AUDIT OVERVIEW

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### 4.1.1.1 Additional information to be provided in company profile

The purpose of the company profile is to provide a general overview of the company's structure and activities which will allow customers to have a clear understanding of the main aspects relating to the company structure, organization, production, processes etc. Therefore, the company profile contains key information about the company, and it is present in all IFS Standards.

To align IFS PACsecure to all IFS Standards, additional information has been added as compulsory in the company profile, and some texts have been reworded. Inclusions and reworded text are shown in **bold**, below:

- **Language in which the IFS PACsecure Audit was conducted**
- **Working language of the production site and language in which the product quality and safety management system/documentation is written**
- The year of construction of the plant
- The registration numbers of the company by authorities if available and / or existing (and GS1 number, if available)
- The COID (IFS Identification Code Number), in case of renewal audit
- When the last investment was made in production, product-oriented investments concerning quality and safety (construction changes, machines). Specify the kind of investment made in production area
- The name and contact data (phone / fax / e-mail) of the contact person in case of emergency (e.g. withdrawal / recall)
- Product groups and products per group produced in the company. Also, indicate if products are food contact packaging materials and/or non-food contact packaging materials, according their intended use.
- **Are there any product exclusions? If yes, please provide explanations**
- **Number of production lines. Which products were produced, and which processes have been running during onsite evaluation?**
- Complete view of the company's processes.
- If the audited company also has trade products (already processed), specify the kinds products
- **Maximum number of employees at peak season during a calendar year (listed according to full time, part time, sub-contracted), shift work.**

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#### // 4.1.1.1 Additional information to be provided in company profile

- **If the company partly or fully outsourced processes, the process and products partly or fully outsourced must be described, and the number and names of the companies (sites) to which processer are outsourced (including address, certification status) must be included.**
- The site area of the plant in square meters (**divided between manufacturing and storage area(s)**)
- **Number of buildings and floors**
- State if the company fulfils the requirements about use of IFS Logo, as defined in IFS PACsecure Audit Protocol (Part 1)
- **Audit duration (in hours).**
- If the certification body has decided to decrease audit duration (see rules in chapter 5.3 of audit protocol), explanations about the reasons for decreasing
- If the site is certified according to other schemes, specify the schemes' names
- If there are seasonal breaks in production process, please specify time frame
- **Is the company subject to multi-location production? If yes, please specify the different COID**

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## Part 4 – Reporting, AuditXpressX™ Software and IFS Audit Portal

### 4.1 Reporting

#### 4.1.2 Audit report

The audit report itself is structured as follows:

- the result of the audit with level and percentage
- observations on KO's and Majors (in case of a follow-up audit, additional explanation on which requirement the Major has been solved)
- general summary table for all chapters
- an overall summary of the audit (of all chapters)
- a list of all established deviations and non-conformities for each chapter (1 to 6)
- a description of follow-up of corrective actions from the previous audit
- a separate list (including explanations) of all requirements evaluated with N/A (not applicable)
- a detailed audit report.

> 4	Reporting, AuditXpressX™ Software and IFS Audit Portal
> 4.1	Reporting
> 4.1.2	Audit report
> 4.1.2.1 DP1.1 4-1.2/1 V2	Additional information to be provided in the audit requirements
> 4.1.2.2 DP1.1 4-1.2/2 V2	What is expected as minimum content in the "overall summary of the audit"?

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## CLARIFICATION ON PART 4 – 1.2 AUDIT REPORT

### 4.1.2.1 Additional information to be provided in the audit requirements

To align IFS PACsecure to all IFS Standards, additional information has been added as compulsory fields to specific IFS PACsecure Audit Requirements. The compulsory fields shall lead to a more significant and descriptive IFS PACsecure Audit Report, even if the auditee fulfils nearly all IFS PACsecure Audit Requirements. The additional content will give more precise information about the auditee. This will add value for every user/reader of the IFS Audit Report. The auditor is requested to provide, during an audit, and even in the case of an A evaluation, an additional justification and/or further background information for these specific requirements for the audited production site.

The compulsory requirements and information to be added by the auditor are shown in the following table:

Part of the audit report	No. of the requirement	Compulsory information to be added
Senior Management Responsibility	KO No. 1 1.2.4	<ul style="list-style-type: none"> <li>Minimum description (e.g. how the senior management take accountability for the effectiveness of the safety and quality management system, and how senior management ensures that employees are aware of their responsibilities related to the product safety and quality management system etc.)</li> </ul>
Hazard analysis/ risk assessment	2.2.3.5.2	<ul style="list-style-type: none"> <li>List of CPs with associated limits.</li> </ul>
Specifications/and other legally required documentation	4.2.1.1	<ul style="list-style-type: none"> <li>Description of finished product specifications checked during the audit.</li> <li>Indicate if the finished product specifications have been agreed upon with the customers</li> </ul>
Specifications/and other legally required documentation	KO N° 3: 4.2.1.2	<ul style="list-style-type: none"> <li>Description of name of raw material specifications (e.g. for raw materials, additives, inks, adhesives, solvents, wrapping materials, rework, etc.) which have been checked during the IFS Audit.</li> <li>Indicate if any raw material used comes from a recycled source.</li> </ul>
Formula/ configura- tion	KO N° 4: 4.2.2.1	<ul style="list-style-type: none"> <li>Indicate if there are technological requirements and/or formulas agreed upon with customers, and which kind of requirements. In case this is applicable, indicate which customer agreements have been checked during IFS Audit, specifying in detail the topic of the customer agreement checked. In case no customer agreements have been agreed, N/A scoring is possible.</li> </ul>

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## // 4.1.2.1 Additional information to be provided in the audit requirements

Part of the audit report	No. of the requirement	Compulsory information to be added
Risk of foreign material, metal, broken glass and wood	KO N° 5: 4.12.1	<ul style="list-style-type: none"> <li>Indicate if there is a procedure implemented to control and manage all types of foreign bodies identified, based on a hazard analysis and assessment of associated risk.</li> <li>Indicate what kind of foreign bodies are included in the procedure, and a short description of used preventive/ control measures (e.g. filters, sieves, X-ray metal detection, visual inspection).</li> </ul>
Traceability	KO N° 6: 4.18.1	<ul style="list-style-type: none"> <li>Description of the traceability system and documentation for traceability in the company,</li> <li>Description of which product/s was/were used for the traceability test during the IFS Audit including details concerning used raw materials, ingredients, additives, rework, wrapping for the final product / mass balance/ results of the traceability tests backwards and forward</li> </ul> <p>Note: The traceability test(s) shall always be based on a sample chosen by the auditor.</p>
Allergens and specific conditions of production	4.19.1	<ul style="list-style-type: none"> <li>Indicate if any allergen have been identified</li> </ul>
Allergens and specific conditions of production	4.19.2	<ul style="list-style-type: none"> <li>Indicate if the customer requires that products are "free from" certain substances or ingredients, or that certain methods of treatment or production are excluded</li> </ul>
Product Fraud	4.20.1	<ul style="list-style-type: none"> <li>Indicate product fraud susceptible raw material and products identified by the company which have been considered in the product fraud mitigation plan. Additionally, the reason identified to consider the aforementioned product fraud susceptible raw material and products shall be given.</li> </ul>
Internal audits	5.1.2	<ul style="list-style-type: none"> <li>Indicate which activities has been identified as critical for the fulfilment of product requirements (incl. safety, quality legal aspects)</li> </ul>
Process validation and control	5.3.1	<ul style="list-style-type: none"> <li>Indicate which are the criteria defined for process validation and control.</li> <li>Indicate the last process validation conducted (process, date, result).</li> </ul>
Process validation and control	5.3.2	<ul style="list-style-type: none"> <li>Indicate which environmental monitoring parameters and limits have been defined by the company based on a risk assessment.</li> </ul>

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## // 4.1.2.1 Additional information to be provided in the audit requirements

Part of the audit report	No. of the requirement	Compulsory information to be added
Product analysis	5.6.1	<ul style="list-style-type: none"> <li>Indicate the analyses carried out by the company to ensure that product requirement and specifications are met, the frequency of these analyses and if are carried out in their own laboratory and/or in an external laboratory.</li> </ul>
Product analysis	5.6.2	<ul style="list-style-type: none"> <li>Indicate if the laboratories (internal/external) used is accredited under ISO 17025. In case not, indicate how the results are verified and in which frequency.</li> </ul>
Complaints management	5.8.1	<ul style="list-style-type: none"> <li>Indicate the range or indicator of complaints raised from customers, retailers/brand owners and authorities.</li> <li>Indicate the main root causes of complaints identified by the company.</li> </ul>
Withdrawal/recall	KO N° 8: 5.9.2	<ul style="list-style-type: none"> <li>Specify how many withdrawals and recalls have been performed since the last audit</li> <li>Specify the product(s) involved and the cause(s) of withdrawals and product recall.</li> </ul>

## CLARIFICATION ON PART 4 – 1.2 AUDIT REPORT

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### 4.1.2.2 What is expected as minimum content in the “overall summary of the audit”?

In general, it should be provided a short explanation of the performance of the company, per chapter:

- Overall fulfilment of the chapter (general comment)
- Main strengths observed
- Weaknesses and risk involved

The key aspect to have in mind is that the summary should be understood by any member of the company and should provide key input to take business decisions (e.g., to close business with this supplier). Text length expected is one page, or two at maximum.

## Part 4 – Reporting, AuditXpressX™ Software and IFS Audit Portal

### 4.1 Reporting

#### 4.1.4 Minimum requirements for IFS PACsecure Certificate (Annex 4)

After successful completion of the IFS PACsecure process, the certification body shall issue a certificate. For the purposes of international recognition, and so as to be understandable, IFS PACsecure certificates awarded by the certification body shall include the following information at a minimum:

- the name and address of the certification body, including its logo
- the logo of the accreditation body or its name and registration number (requirement mentioned in the ISO/IEC Guide 65, G.12.7.) the logo of accreditation body shall be used in conformity with accreditation body's rules
- the name and address of the audited company
- the COID, as defined in the IFS Portal
- if the company is a subsidiary, the name of the company's headquarters
- audit scope (with mandatory detailed descriptions of processes/products).
- name and number of product scope(s)
- level achieved
- audit score in percentage, if required by the customer or by the audited company
- date of audit (last day of audit)
- date of follow-up audit if relevant
- next audit to be performed within the time period (renewal audit)
- certificate issue date



#### // 4.1.4 Minimum requirements for IFS PACsecure Certificate (Annex 4)

- certificate expiry date, i.e. 12 months after the date of issue the certificate (the certificate validity date shall remain the same each year as described in the audit protocol, Part 1 and Part 5 (for unannounced option).
- place and date of signature
- name and signature of the certification body s person(s) responsible for the certification decision as described in Part 3 of the Standard
- IFS PACsecure logo
- PACsecure logo
- QR-code.

> 4	Reporting, AuditXpressX™ Software and IFS Audit Portal
> 4.1	Reporting
> 4.1.4	Minimum requirements for IFS PACsecure Certificate (Annex 4)
> 4.1.4.1 DP1.1 4-1.4/1 V1	Sentence to be written on the announced certificate when the company still didn't decided on announced or unannounced audit for the following year
> 4.1.4.2 DP1.1 4-1.4/2 V2	How is the COID managed for companies with different legal entities?
> 4.1.4.3 DP1.1 4-1.4/3 V1	Indication of date of the last unannounced audit conducted
> 4.1.4.4 DP1.1 4-1.4/4 V1	How to write the audit scope in the certificate and audit report

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## CLARIFICATION ON PART 4 – 1.4 MINIMUM REQUIREMENTS FOR IFS CERTIFICATE (ANNEX 4)

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### 4.1.4.1 **Sentence to be written on the announced certificate when the company still didn't decided on announced or unannounced audit for the following year**

What shall be written on the announced certificate in the following case: the CB is about to issue the certificate for the present year's audit, but the company has not decided on announced or unannounced audit for the following year.

The same sentence used for unannounced templates certificates can be chosen by the CB agreed with the company: "Next audit between XX.XX and XX.XX or unannounced" can be written both in the first page of the audit report and on the certificate.

## CLARIFICATION ON PART 4 – 1.4 MINIMUM REQUIREMENTS FOR IFS CERTIFICATE (ANNEX 4)

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### 4.1.4.2 How is the COID managed for companies with different legal entities?

**New company address and/or different name, same employees, same equipment, same processes:**

- **change of COID because it is a different site**
- The first audit to be performed at the new site is an initial audit. Therefore, the 3 consecutive times audit by the same auditor rule doesn't apply.
- The certification body shall decide when the certificate of the "old" site shall be suspended as soon as the production stops. It is recommended that the action plan of the "old" site is checked by the auditor especially in case there was any product safety and quality management system deviation(s) and non-conformity/ies.

**Same company name, same address, new management (new owner), same equipment, same process:**

- **Non change of COID**
- The CB shall perform a risk assessment and assess whether it is necessary to perform a "control-audit" to ensure that the current certificate is still valid.

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## CLARIFICATION ON PART 4 – 1.4 MINIMUM REQUIREMENTS FOR IFS CERTIFICATE (ANNEX 4)

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### 4.1.4.3 Indication of date of the last unannounced audit conducted

The certificate shall also include the date of the last audit conducted unannounced (last day of the audit). If no unannounced IFS PACsecure audit has been conducted for the respective COID, yet, the certificate shall indicate the following: “**Last audit conducted unannounced: n/a**”. This information shall be added manually by the certification body.

This rule is applicable for all certification audits starting off 1<sup>st</sup> January 2021.

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## CLARIFICATION ON PART 4 – 1.4 MINIMUM REQUIREMENTS FOR IFS CERTIFICATE (ANNEX 4)

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### 4.1.4.4 How to write the audit scope in the certificate and audit report

The description in the report and certificate of the process(es)/products groups of the audit scope, has to provide enough information for the reader to understand what is defined under the scope of the IFS certificate.

General explanations like e.g. “production of glass” is not allowed as this does not provide sufficient information, as glass is a general word that can describe a wide category of products. In addition, brand names are not allowed as they don't give the detailed description of the product category.

Words in the scope on the certificate like sales, distribution, R&D, development/design shall not be mentioned, as these topics will be investigated in an IFS PACsecure audit.

The scope of the IFS PACsecure certificate shall contain the following minimum elements:

- Detailed descriptions of process(es)/product(s)
- Information about the intended use of products (food contact and/or non-food contact packaging materials)

## Part 5 – Audit protocol for unannounced audits

### 5.0 Introduction

The rules of this document apply from April 2018, meaning that any audit scheduled after this date may be performed as an unannounced audit.

> 5	Audit protocol for unannounced audits
> 5.0	Introduction
> 5.0.1 DP1.1 5-0/1 V1	Mandatory application of the unannounced option once every three years
> 5.0.2 DP1.1 5-0/2 V1	Timeframe for the unannounced audit registration

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## CLARIFICATION ON PART 5 – 0 INTRODUCTION

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### 5.0.1 **Mandatory application of the unannounced option once every three years**

The option “unannounced” shall be mandatory chosen at least once every third certification audit on a mandatory basis.

Based on this rule, in case the certification cycle is interrupted where an unannounced audit was due, the next certification audit (= initial audit) has to be conducted unannounced as well.

This rule applies in case the company (COID) is changing its certification body or in case the company was formally certified against any other GFSI recognized Standard.

This rule is applicable for all certification audits starting off 1<sup>st</sup> January 2021.

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## CLARIFICATION ON PART 5 – 0 INTRODUCTION

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### 5.0.2 Timeframe for the unannounced audit registration

In exceptional cases where there is a need to align with other standards in case of combined audits, the option 2 can be chosen for the unannounced audit registration. With option 2 it is possible to postpone or move the audit time frame forward. Based on the new time frame, the validity of the next certificate will change. With option 2 the certificate validity can be shorter in comparison with option 1 (first day of the individual chosen period +8 weeks –1 day + 1 year). Therefore, certification bodies and suppliers should discuss possible certification gaps before the registration.

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## Part 5 – Audit protocol for unannounced audits

### 5.1 Audit planning

#### 5.1.4 Audit scope

##### 5.1.4.1 Specific audit process for multi-location companies with central management

If defined processes are centrally organized in a company with several production sites (e.g. purchasing, personnel management, complaint management, etc.):

- The central managing site—headquarters—shall be audited announced or unannounced. The audit shall always take place before the audit of each production site and shall be performed before the start of the unannounced audit time window of the production site audits.
- The production sites shall be audited unannounced.
- The audit of headquarters (announced or unannounced) and the unannounced audit of the production site(s) shall not be performed during consecutive days (e.g. if the headquarter is located within one of the production sites, there shall be 2 different audits: an announced or unannounced audit for the centrally organized processes and an unannounced audit for the production site.)
- All audits, including headquarters', shall be performed within a maximum timeframe of 1 year.

> 5	Audit protocol for unannounced audits
> 5.1	Audit planning
> 5.1.4	Audit scope
> 5.1.4.1	Specific audit process for multi-location companies with central management
> 5.1.4.1.1	About the new version and multi-location companies
DP1.1 5-1.4.1/1 V1	

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## CLARIFICATION ON PART 5 – 1.4.1 SPECIFIC AUDIT PROCESS FOR MULTI-LOCATION COMPANIES WITH CENTRAL MANAGEMENT

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### 5.1.4.1.1 About the new version and multi-location companies

If the audit of the central managing site is performed before the 2<sup>nd</sup> July 2018 and a related production site is audited unannounced with a time window starting from 2<sup>nd</sup> July 2018, the new and updated requirements of IFS PACsecure Version 1.1 must be evaluated in this site audit.

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## Part 5 – Audit protocol for unannounced audits

### 5.3 On-site audit performance

#### 5.3.1 Start of the unannounced audit

As for announced audits, it is not possible to include in the scope of the IFS PACsecure certification production lines of the audited site, which are not operating during the audit, unless those production lines involve the same product as the lines, which are audited when operating.

If, during the unannounced audit, some lines are not operating and involve different products, an additional audit of the lines, when operating, is mandatory.

> 5	Audit protocol for unannounced audits
> 5.3	On-site audit performance
> 5.3.1	Start of the unannounced audit
> 5.3.1.1	How to proceed with lines that are not operating during the audit
DP1.1 5-3.1/1 V2	

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## CLARIFICATION ON PART 5 – 3.1 START OF THE UNANNOUNCED AUDIT

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### 5.3.1.1 How to proceed with lines that are not operating during the audit

As for announced audits, it is not possible to include in the scope of the IFS PACsecure Certification production lines of the audited site, which are not operating during the audit, unless those production lines involve the same **hazard analysis/risk assessments**, and the same **scopes of product and processes related**, as the lines which are audited when operating.

If, during the unannounced audit, some lines are not operating and involve different **hazard analysis/risk assessments, and/or different scopes of product**, an extension audit of the lines, when operating, is mandatory.

The extension audit shall be performed announced.

## Part 5 – Audit protocol for unannounced audits

### 5.5 Conditions for issuing audit report and certificate

The same requirements as in the current IFS PACsecure Standard (part 1, chapter 5.8) apply for issuing the certificate.

The option “Unannounced” will be clearly stated on the IFS certificate.

> 5	Audit protocol for unannounced audits
> 5.5	Conditions for issuing audit report and certificate
> 5.5.1 DP1.1 5-5/1 V2	How to handle the follow-up audit in the unannounced certification process?
> 5.5.2 DP1.1 5-5/2 V2	Can a CB perform an unannounced audit after a failed unannounced audit?

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## CLARIFICATION ON PART 5 – 5 CONDITIONS FOR ISSUING AUDIT REPORT AND CERTIFICATE

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### 5.5.1 How to handle the follow-up audit in the unannounced certification process?

In cases where a Major and total score  $\geq 75\%$  has been rated during an unannounced audit, the follow-up audit shall be announced.

In the case of a successful follow-up audit after an unannounced audit, the certificate and report can state "unannounced audit". In such a case, the CB has to change the certificate and report to "unannounced" manually.

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## CLARIFICATION ON PART 5 – 5 CONDITIONS FOR ISSUING AUDIT REPORT AND CERTIFICATE

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### 5.5.2 Can a CB perform an unannounced audit after a failed unannounced audit?

No, the audit following a failed audit shall be announced.

It is in the interest of all stakeholders to achieve the new certification as soon as possible. The time window for the unannounced audit is 16 weeks (+ 2 weeks) and the unannounced principle allows that the audit can be conducted at the end of this time window. As a result, the company could be without a certificate for more than 5 month (following the certification process steps).

The risk that some of their suppliers may not be certified for a long timeframe is not acceptable for stakeholders.

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