Transition to ISO 22003-1:2022 for FSMS (Food Safety Management System)



Information Circular - Transition to ISO 22003-1:2022 for FSMS (Food Safety Management Systems) issed by RIR Certification

Dear Sirs.

We hereby inform that in June 2022, ISO 22003-1:2022 Part 1 - Requirements for bodies providing audit and certification of food safety management systems, applicable to Food Safety Management System Certification Bodies, was published.

This new standard replaces International Technical Specification ISO/TS 22003:2013, which was concurrently withdrawn, but remains valid until the end of the transition period. With the aim of providing harmonized guidance to all stakeholders, IAF has drafted a mandatory document specifying the actions to be taken for the proper management of the transition; this document is IAF MD 27:2023 - transition requirements for ISO 22003-1:2022 issue 1, available at

https://iaf.nu/iaf_system/uploads/documents/IAF_MD_27_22003-1_Transition_30082023.pdf to be considered for details.

However, the concurrent publication of newly versions of FSMS schemes, which come into effect at a more restrictive time than identified by the IAF document, impose tighter deadlines for managing of this transition.

1. Detailed Transition Period

RIR may use ISO 22003-1:2022 for all initial clients after accreditation for ISO 22003-1:2022	No later than 24 months from publication month of document – 30 June 2024 or transition of the accreditation, whichever is later.
RIR to use ISO 22003-1:2022 for all clients no later than	30 months from publication month of document - 31 December 2024.
Completion of audit activites including the implement all changes impacting their existing clients such as sampling and audit time calculations according to ISO 22003-1:2022	36 months from publication month of document - 30 June 2025.

** For existing certified clients: As requirements for multisite sampling and audit time determination have changed in the 2022 edition, it is acceptable that the contract between the RIR and the client is revised to follow new requirements. The revision must be completed to allow RIRs sufficient time to implement all changes necessary by no later than 31 December 2024. Implementation must ensure that by 30 June 2025 all clients have been audited in accordance with the revised requirements, as an example any sites that are no longer eligible for sampling have been audited.

1.1 ISO 22000:2018 Audits

The transition audit is going to be the regular audit within the certification cycle, whether it is a surveillance or recertification audit and will be delivered as per the requirements of ISO 17021-1:2015 and ISO 22003-1:2022.

1.2 ISO 22000:2018 Certificates

Once the client has successfully completed the transition audit followed by a positive certification decision, the certification reviewer will decide if the certificate needs to be re-issued.

- For the recertification upgrade audits all certificates are going to be re-issued as per normal process.
- For Surveillance upgrade audits- the certificates need to be re-issued only for clients which the (sub) categories were impacted by the change made on the ISO 22003-1:2022 and/or in case client has any change on their scope (extension or reduction).

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2. SUMMARY OF CHANGES

The main changes between ISO/TS 22003:2013 and ISO 22003-1:2022 include but are not limited to:

- i) New HACCP Study definition
- ii) Changes/additions to Clause 7:
- a. Definition of certification functions within the CAB
- b. Establishes technical requirements based on Annex A and competence requirements based on Annex C
- c. Requirement for CABs to evaluate food safety knowledge
- d. Establishes knowledge requirements for evaluators of personnel competence
- iii) Changes/additions to Clause 8:
- a. Requirement to use Table A.1 for the scope of certification documents
- b. Expanding guidance on the use of the marks
- iv) Changes/additions to Clause 9:
- a. Audit duration requirements
- b. Requirements for defining scope of certification
- c. Multi-site sampling
- d. Requirements for initial audits
- e. Initial Audit expectations
- f. Unannounced audits
- v) Changes/additions to Annex A
- a. Defines scope of CB operations to subcategory level
- b. Defines auditor and audit team competence
- c. Changes to subcategories and clusters
- · Addition of BIII Pre-processing handling of plant products
- Addition of C0 Animal Primary conversion
- Separation of clusters for categories H, I and J
- · Removal of subcategories D and G
- vi) Changes/additions to Annex B:
- a. Inclusion of references to multi-site and integrated management systems
- b. Expanding Table to the subcategory level
- c. Adjustment to the minimum onsite audit days & FTE considerations
- d. Changes to audit time calculations
- Vii) Changes/additions to Annex C:
- a. Incorporation of competencies from ISO/IEC 17021-1 Annex A
- b. Changes in competencies

3. Major Changes Applicable to clients

Certified clients will be mainly affected by the following changes:

- i)) Scope of certification
- ii) Requirements for audit time determination
- iii) Requirements for multi-site sampling

3.1 Identifying the Scope of Certification

Defined Scope of Certification shall not A) be misleading

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- B) The scope of certification should be clearly defined and accurately reflect the client's operational activities, processes, products or services can have an influence on the food Safety of the end product as defined by legal responsibility of the organization activities.
- C) Include any promotional statements, brands or claim.

The audit scope will be agreed between your site and RIR before the certification audit begins. The scope of the audit shall cover the required level of certification, the food sector categories, and the products listed under the scope of certification for a site.

Category	Subcategory	Description	Example of included activities and products
A	AI	Farming of animals for meat/ milk/ eggs/honey	Raising animals (other than fish and aquaculture) used for meat production, egg production, milk production or honey production. Growing, keeping, trapping and hunting (slaughtering at point of hunting).
			Associated temporary packing without modification or processing of the product.
	AII	Farming of fish and seafood	Raising fish and seafood used for meat production. Growing, trapping and fishing (slaughtering at point of capture). Associated temporary packing without modification or processing of the product
В	ВІ	Farming - Handling of plants (other than grains and pulses)	Growing or harvesting of plants (other than grains and pulses): horticultural products (fruits, vegetables, spices, mushrooms, etc.) and hydrophytes for food.
			On farm storage of plants (other than grains and pulses), including horticultural products and hydrophytes for food.
	BII	Farming - Handling of grains and pulses	Growing and harvesting of grains and pulses for food. Handling grains and pulses.
			On farm storage of grain and pulses for food.
	BIII	Pre-process handling of plant products	Activities on harvested plants that do not transform the product from original whole form, including horticultural products and hydrophytes for food. These include cleaning, washing, rinsing, fluming, sorting, grading, trimming, bundling, cooling, hydro-cooling, waxing, drenching, aeration, preparing for storage or processing, packing, repacking, staging, storing, and loading.
	C0	Animal - Primary conversion	Conversion of animal carcasses intended for further processing including lairage, slaughter, evisceration, bulk chilling, bulk freezing, bulk storage of animals and game gutting, bulk freezing of fish and storage of game
С	CI	Processing of perishable animal products	Processing and packaging including fish, fish products, seafood, meat, eggs, and dairy requiring chilled or frozen temperature control.
			Processing pet food from animal products only.
	CII	Processing of perishable plant-based products	Processing and packaging including fruits and fresh juices, vegetables, grains, nuts, pulses, frozen water-based products, plant-based meat, and dairy substitutes.
			Processing pet food from plant products only.
	CIII	Processing of perishable animal and plant products (mixed products)	Processing and packaging including pizza, lasagna, sandwiches, dumplings, and ready-to-eat meals. Includes off-site catering kitchens. Includes products of industrial kitchens not offered for immediate Consumption

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CIV Processing of ambient stable products stored and sold at ambient stable products Processing and packaging of products stored and sold at ambient temperature including canned foods, biscuits, snacks, oil, drinking water, beverages, pasta, flour, sugar, and food-grade sait. Processing ambient stable pet food Processing feed material intended for food and non-food producing animals not kept in households, e.g., meal from grain, oilseeds, by- products of food production. Processing feed mixtures, with or without additives, intended for food-producing animals, e.g. premixes, medicated feed, compound feeds E E Catering/ Food Service Open exposed food activities such as cooking, mixing, and blending, preparation of components and products for on-site direct consumer consumption of take away. Examples include restaurants, hotels, food trucks, institutions, workplaces (school or factory cafeteria), including retail with on-site preparation (e.g., rotisserie chicken). Includes reheating of food, event catering, coffee shops and pubs. FII Brokering //Wholesale/ E-commerce FII Brokering //Trading //E-commerce G G G Transport and Storage and provision of finished products to customers and consumers (retail outlets, shops, wholesalers). Includes minor processing activities, e.g., slicing, portioning, reheating Buying and selling products on its own account without physical handling or as an agent for others of any item that enters the food chain that enters the food chain Storage facilities and distribution vehicles for perishable food and feed where temperature integrity shall be maintained. Storage facilities and distribution vehicles for perishable food and feed where temperature integrity shall be maintained. Storage facilities and distribution vehicles for food packaging material I Production of packaging material in contact with food, feed, and animal food. May include packaging produced on - site for use in processing. K K Production of Bio-chemicals Production of food and feed processing aids, ad				
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	K	K		(e.g., flavorings, vitamins), gases and minerals.
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Note: "Perishable" can be considered as food of a type or condition such that it can spoil and must be preserved in a temperature controlled environment

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3.2 Basic Guides for Audit Duration

RIR shall calculate the audit duration based on the information gathered from the organization's application and following the requirements of ISO/IEC 17021-1 and ISO 22003-1:2022 as follows:

- The duration of an audit day normally is eight (8) hours. In exceptional circumstances an audit day may
 be longer than 8 hours but shall never exceed 10 hours and then only in accordance with International
 Labor Organization (ILO) and national legislative requirements.
- The effective audit duration does not include a lunch break, planning, reporting and travel activities.
- The audit duration calculation for ISO 22000 shall be documented in the contract review form, including
 justifications for reduction or addition of time based on the minimum audit duration.
- The audit time does not include planning, reporting or travel activities, only actual auditing time. The audit time shall only apply to auditors that are fully qualified, approved as ISO 22000 auditors (provisional or lead auditors). Trainee auditors do not contribute to audit duration.

3.3 ISO 22000 Audit Duration Calculation

The total audit time (for a single site) is defined as Ts. In additional to that, RIR shall include appropriate time for the audit report.

Calculate the DS: Which is the total audit duration calculated according to ISO 22003-1:2022: • $D_S = (T_D + T_H + T_{FTE})$, where

- T_D = is the basic site audit duration for (sub)categories and scope of certification (includes one HACCP study), in days;
- T_H = is the number of audit days for additional HACCP studies;

Note: A HACCP study corresponds to a hazard analysis for a family of products/ processes /services with similar hazards and similar processes and technology

• T_{FTE} = is the number of audit days per number of FTE employees.

Note 01: When determining the number of employees involved in any aspect of food safety, it shall be expressed as the number full-time equivalent (FTE) employees.

When an organization deploys workers in shifts and the products and/or processes are similar in all shifts, the # of effective FTE will be calculated based on employees on the main shift (including seasonal workers) plus non-production staff having an impact on food safety.

When an organization deploys workers in shifts and the products and/or processes are NOT similar in all shifts, the # of effective FTE will be calculated based on the total # of FTE in all shifts (including seasonal workers) plus non-production staff having an impact on food safety.

If the organization has only 01 shift, the # of effective FTE will be calculated based on employees from this shift (including seasonal workers) plus non-production staff having an impact on food safety.

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Table B.1- Variables for Calculation of Minimum Audit Duration (Ref: ISO 22003-1:2022)

Food Chain Category or Sub Categories	Basic Site Audit Duration, in Audit Days	Number of Audit Days for each Additional HACCP Study	Effective Number FTE
	T _D	T _H	T _{FTE}
AI, AII	1.0	0.25	0 to 5 = 0
BI, BII, BIII	1.0	0.25	6 to 49 = 0.5
C0, CI, CII, CIII, CIV	2.0	0.50	50 to 99 = 1.0
D	1.0	0.50	100 to 199 = 1.5
E	1.5	0.50	200 to 499 = 2.0
FI, FII	1.0	0.50	500 to 999 = 2.5
G	1.5	0.25	>1000 = 3.0
Н	1.5	0.25	
	1.5	0.50	
J	1.5	0.50	
K	2.0	0.50	

Audit Type	Calculation	
Initial Audit (IA)	IA (Initial Audit) = Ds + Preparation Time + Report Time	
	Stage 01: 1/3 of (Ds)	
	 Stage 02: 2/3 of (Ds) + Preparation Time + Report Time +* 	
	 Stage 01 + Stage 02 = IA 	
Surveillance Audit (SA)	SA 01 = (1/3 x Ds) + Preparation Time + Report Time +*	
	SA 02 = (1/3 x Ds) + Preparation Time + Report Time +*	
Recertification Audit (RA)	RA (Re-certification) = (2/3 x Ds) + Preparation Time + Report Time+*	
*= any other additional audit time need		

- The minimum surveillance audit duration shall not be less than one-third of the initial certification audit duration, with a minimum of 1 audit day (0,5 audit day for categories A and B).
- The minimum recertification audit duration shall not be less than two-thirds of the initial certification audit duration, with a minimum of 1 audit day (0,5 audit day for categories A and B).

3.4 Multisite

- The site audit duration of the central function shall be equal to or greater than Ds.
- The site audit duration for each site audited shall be equal to or greater than half of Ds for that site.
- The use of multi-site sampling is permitted for categories A and B. Sampling may be applied to multisite organizations, with the minimum sample size being the square root of the total number of sites: $\sqrt{(x)}$, rounded up to the next whole number.
 - The square root sample shall be taken per risk category based on production complexity of the sites (e.g. open field plant production, perennial plant production, indoor production, open field livestock production, indoor livestock production).
- The use of multi-site sampling is permitted for categories F and G, and only for re-heating-type facilities (e.g. event catering, coffee shops, pubs) for category E and only for facilities with limited preparation or cooking (e.g. re-heating, frying). For organizations with 20 sites or fewer, all sites shall be audited. For organizations with more than 20 sites, the minimum number of sites to be sampled shall be 20 plus the square root of the total number of other sites: y = 20 + √(x − 20), rounded up to the next whole number. This applies to the initial certification, to surveillance and to recertification audits.
- The use of multi-site sampling is not permitted for any other categories other than the those listed above.

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Sampling Plan for Multi-site Organizations

	Total Number of Sites								
	X between 1 and 20	21	22	23	24	25	26	27	28
Number of Sites above 20	0	1	2	3	4	5	6	7	8
Additional Number of sites to be audit	0	1	1	1	1	1	2	2	2
Number of sites to be audited	х	21	21	21	21	21	22	22	22

3.5 Additional Time

3.5.1 Use of translator

Additional on-site audit time shall be added in case a translator is required to support the audit team. For translation the minimum time recommended to be added is 0.25 on site auditor day. The maximum time needed will depend about the percentage of duration that the translator will attend the audit.

3.5.2 Extension of Scope

If the scope extension audit is combined with one audit belonging to the regular cycle, the total audit duration shall be calculated by including the parameters of the extended scope. If a stand-alone extension of scope audit is required, the duration may vary depending of the intended scope extension. Both situations above refer to an extension of scope in a site already ISO 22000 certified. If the site is not ISO 22000 certified yet, it shall be treated as a new certification process based on the initial audit duration calculation.

3.5.3 ISO 22000 Special Audit

If a separate special audit is required, the duration may vary depending on what will be audited. If the special audit is combined with one audit belonging to the regular cycle, the audit duration shall be increased on the top of ISO 22000 assessment.

3.5.4 Outsource Activity

Any outsourcing of any activities included in scope of certification.

3.5.5 Complexity of the client activities

e.g., number of product and process types, number of product lines, number of people or type and variety of tasks affecting food safety, product development, in house laboratories testing, sanitation) and its FSMS

3.5.6 Other Factors

- Audit Delivery Methods- ICT and the Extent use
- High degree of regulation & Statutory context
- the Hazards associated with products, processes and services of the organization

3.6 Reduction in Time

In cases of unusually high repetitive shifts or process a reduction, a coherent and consistent reduction can be applied on a company-to-company basis within the scope of certification.

• Ds cannot be reduced below 1 day (0,5 audit day for categories A and B)

3.6.1 Integrated audit

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- In cases that FSMS is integrated with another relevant management system(note 01) (quality or food safety system) or food safety system (FSS(note 02)), a reduction in audit duration is possible.
- The combined audit duration shall be determined and recorded as follow:
 - 1. Calculate the audit duration for each scheme separately (including scheme restrictions and allowed reductions).
 - 2. Add the audit durations together.
 - 3. Determine the degree of reduction considering a maximum of 20% reduction can be made on the combined duration. The reduction range based on integration is 0% to 20% determined by the level of integration of overall business strategy, management reviews, approach to policy, objectives, systems, processes, internal audits and effective corrective action to prevent reoccurrence.
- Note 01: "Relevant management system" means a quality or food safety system which covers the same processes, products and services.
- Note 02: FSS certification: a product certification that incorporates requirements based on the internationally accepted principles of food safety and management system components that support the production of safe food.

3.6.2 Follow Up Audit

ISO 22000 Follow Up Audits In the case where a follow up audit is required, duration will depend on the objective of the follow up audit and so shall be analysis case by case

3.6.3 Other Factors

- the maturity and effectiveness of the FSMS, type of audit (e.g., initial, surveillance, Unannouced, follow-up) and the results of any prior audits
- the level of automation, closed production systems, use of technology, mechanization and labor intensiveness;
- Level of centralized control of the FSMS (applicable in Multi-site)

3.7 Multi-site certification

A multi-site organization is an organization having an identified central function at which certain FSMS activities are planned, controlled or managed, and a network of sites at which such activities are fully or partially carried out.

Examples of possible multi-site organizations are:

- organizations operating with franchises;
- producer groups (for categories A and B);
- a manufacturing company with one or more production sites and a network of sales offices;
- service organizations with multiple sites offering a similar service;
- · organizations with multiple branches.

Sampling of multi-site organizations shall cover all activities.

When multi-site sampling is undertaken, the rationale to apply it will be based on the following conditions: a) sites are operating under one centrally controlled and administered FSMS;

b) sites subject to sampling are similar (food chain subcategory, geographical location, processes and technologies, size and complexity, regulatory and statutory requirements, customer requirements, food safety hazards and control measures);

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- c) the central function is part of the organization, clearly identified and not subcontracted to an external organization;
- d) all sites have a legal or contractual link with the central function;
- e) the central function has organizational authority to define, establish and maintain the FSMS;
- f) all sites are subject to the organization's internal audit programme and have been audited;
- g) audit findings at a site are considered indicative of the entire FSMS and corrective actions are implemented accordingly;
- h) the central function is responsible for ensuring that outcomes of performance evaluation and customer complaints from all sites are collected and analysed; the organization's FSMS is subject to central management review;
- i) the central function has authority to initiate continual improvement of the FSMS.

NOTE The central function is where operational control and authority from the top management of the organization is exerted over every site. There is no requirement for the central function to be located in a single site.

Where multi-site sampling is permitted, the organization shall conduct an internal audit for each site within one year prior to certification and when applicable the effectiveness of corrective actions shall be available. Following certification, the annual internal audit shall cover all sites of the organization included in the certification scope of the multi-site organization and ongoing effectiveness of corrective actions shall be demonstrated.

Where multi-site sampling is permitted, a sampling programme will be implemented to ensure an effective audit of the FSMS where the following conditions apply:

- a) At least annually, an audit of the central function for the FSMS shall be performed by the certification body prior to the sampled site audits.
- b) At least annually, audits shall be performed by the certification body on the required number of sampled sites.
- c) Audit findings of the sampled sites shall be assessed to ascertain if these indicate an overall FSMS deficiency and therefore can be applicable to some or all other sites.
- d) Where audit findings of the sampled sites are considered indicative of the entire FSMS, corrective actions shall be implemented accordingly.
- e) For organizations with 20 sites or fewer, all sites shall be audited.

RIR will increase the size of sample or terminate the site sampling where the FSMS subject to certification does not indicate the ability to achieve the intended results.

The sample shall be partly selective and partly random and shall result in a representative range of different sites being selected, ensuring all processes covered by the scope of certification will be audited. At least 25 % of the sample will be selected at random. The remainder will be selected so that the differences among the sites selected over the period of validity of the certification are as large as possible.

For the site selection RIR will consider, among others, the following aspects:

- a) results of internal audits, management reviews or previous audits:
- b) records of complaints, product withdrawals/recalls, and other relevant aspects of corrective action;
- c) variations in the site characteristics;
- d) other relevant changes since the last audit.

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If any site has a major nonconformity and satisfactory corrective action have not been implemented in the agreed time frame, certification shall not be granted or maintained for the whole multi-site organization pending satisfactory corrective action. The certification body shall identify and include in the scope of certification the processes of the FSMS implemented at each sampled site.

4. ICT (Information and Communication Technology) use in ISO 22000 Audits

The standard method for conducting ISO 22000 audits is either through full on-site audits or as ICT audit approach (remote + on site).

The ISO 22000 full remote option is an accredited, voluntary option that can only be utilized where access to the premises of the certified organization is not possible as a direct result of a serious event, supported by a risk and feasibility assessment.

4.1 Definition

- Full Remote Audit: A full remote audit is defined as an audit that takes place entirely at a location other than that of the certified organization through the use of ICT.
- ICT audit approach (Remote + On Site): ISO 22000 audit as a split process utilizing ICT. The ICT audit approach audit consists of 2 main steps being the remote audit and the on-site audit.
- ICT: is the use of technology for gathering, storing, retrieving, processing, analyzing and transmitting information. It includes software and hardware such as smartphones, handheld devices, laptop computers, desktop computers, drones, video cameras, wearable technology, artificial intelligence, and others.

4.2 ICT audit approach

The ICT Audit Approach is voluntary and shall to be mutually agreed between the RIR and the certified organization prior to the audit. The ICT audit approach consists of 2 main steps:

- Remote audit component consisting of a document review and interview key personnel using ICT.
- On-site audit component focusing on the implementation and verification of the FSMS, the physical inspection of the production process and any requirements not covered during the remote audit.

4.3 Full remote

The ISO 22000 full remote option is an accredited, voluntary option that can only be utilized where access to the premises of the certified organization is not possible as a direct result of a serious event, supported by a risk and feasibility assessment. Mutual agreement between RIR and the certified organization is required prior to conducting the full remote audit.

A full remote audit is defined as an audit that takes place entirely at a location other than that of the certified organization through the use of ICT.

5. Use of Marks (RIR & IAS)

The instructions for use of the RIR FSMS certification and IAS (Accreditation Body) marks are available on Procedure 18- use of logo & mark.

It is not authorized the use of the FSMS certification mark or any statement that the client has a certified FSMS on the product nor the product packaging, both primary packaging (which contains the product) and any outer or secondary packaging.

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