

IFS HPC Version 3 Doctrine v1



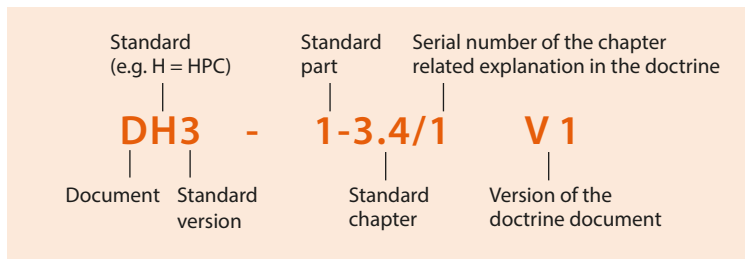
Foreword

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

All explanations and decisions in 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 (2) letters stand for "Doctrine HPC", and the number 3 for the "Standard version 3". The second section of the name specifies the part of the standard to which the document refers (the IFS HPC 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.

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



E.g. DH3-1-3.4/1 V 1 means the document is the first IFS HPC Doctrine explanation which refers to the chapter 3.4 in the first part of the IFS HPC version 3.

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. If no changes are marked, it means the content already existed in the same way for IFS HPC v2 or in the previous doctrine version. Please note that the comment "reworked wording" indicates a grammatical correction or improvement of the language. 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. In case of a new IFS Standard version, the rules apply at the moment the new version is applicable.

Certification bodies shall ensure that relevant certification body personnel are trained on the introduced changes according to their function within the certification body before the rules come into force. A proof of this training shall be available on request.

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CLARIFICATION ON PART 1 – 2.1 MAKING A CONTRACT WITH A CERTIFICATION BODY

PART 1 – IFS HPC Certification Protocol

1.2 Before the IFS HPC Audit

1.2.1 Making a contract with a certification body

1.2.1.1 Are there any IFS rules for the use of interpreters during an IFS HPC Audit?

The IFS HPC Audit shall be carried out in the working language of the production site. In cases where the quality of the IFS HPC Audit can be compromised and the need of an interpreter is necessary, the certification body shall provide a qualified interpreter who has no affiliation to the company. In any case, the certification body is responsible for ensuring a trustworthy audit (e.g. proper communication with personnel, checking documentation etc.) and to determine the total audit duration due to translation activities.

Before the audit, the certification body shall check if it is possible to conduct the audit in English. The documentation shall be checked to see whether it is also available in English and that the employees are able to communicate in English, etc. In case this cannot be ensured, the certification body shall make use of an interpreter.

Requirements of an interpreter:

- The interpreter shall have a technical background or shall be an approved auditor for another product safety / quality standard.
- The interpreter shall be independent from the audited company to avoid any conflict of interest.
- To ensure a proper audit performance an appropriate amount of time shall be added.

Based on the aforementioned situation, the interpreter shall either provide support during the complete audit or for the on-site evaluation only (employee interviews).

Specific situation for an audit team:

No interpreter is necessary when at least one auditor in the audit team is qualified for the respective language. However, in this case the auditor will also act as the interpreter and the audit team may not split during the audit.

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// 1.2.1.1 Are there any IFS rules for the use of interpreters during an IFS HPC Audit?

In general, the language of the report shall be the working language of the company, with the help of an interpreter if necessary. If it is agreed that the report is to be in English only, this must be first confirmed by all parties involved.

Note: Specific rules apply for the use of an interpreter in China. In the case of an audit conducted with an interpreter, the auditor must be registered with the China Certification and Accreditation Association (CCAA). In case of an audit team, the team shall be composed of a foreign auditor (other than Chinese) and a Chinese auditor registered with the CCAA.

CLARIFICATION ON PART 1 – 2.2 SCOPE OF THE IFS HPC AUDIT

1.2.2 Scope of the IFS HPC Audit

1.2.2.1 Clarification on the coverage of the standard: How to handle B2B products?

Type of commercial transaction	B2C	B2B			
User group	Consumer	Professional use	Industrial use		
Type of product		Finished products	Raw materials		Bulk or loose products
Description	Consult the IFS HPC Standard part 1, Chapter 2.2 for further information	Final products sold to another company for professional use (including labelling) which are applied by professional users who are trained for the handling of these products	Products intended to be used as raw material to be further processed to form a final product	Products from chemical industry not already covered by the HPC Standard (B2C)	Products which just need to undergo minor changes to form the final product and which fulfil all requirements for finished products with regard to legislation, quality and customer requirements
Examples		<ul style="list-style-type: none"> Detergents used for cleaning activities in different industries Dyes used at hairdressers 	<ul style="list-style-type: none"> Jumbo paper reels to produce e.g. napkins or toilet paper Plastic films sheets made of polyethylene, PVC etc to form plastic bags <p>Note: Processes like e.g. cutting, printing, folding, whitening, adding chemical agents etc characterise further transformation</p>	<ul style="list-style-type: none"> Sulfuric acid Boric acid etc. 	<ul style="list-style-type: none"> Cosmetic or detergent base <p>Note: Processes like simple filling/packing and labelling characterise minor changes</p>
	Included	Included	Not included	Not included	Included

Note: If bulk or loose products are to be included in the audit scope/certificate, the production steps need to be described as usual and the final container of the products need to be mentioned (e.g. IBC, bulk, tank, container etc.):

e.g. Manufacturing, [...] of shampoo base in bulk, mixing of detergent base in IBC etc.

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CLARIFICATION ON PART 1 – 2.3 TYPE OF HPC AUDITS

1.2.3 Type of HPC Audits

1.2.3.1 Which version of the IFS HPC Standard shall be applied in some specific situations.

In case the audit starts on or after 1st of June 2023, IFS HPC v3 audits are possible.

In case the audit starts on or after 1st of September 2023, IFS HPC v3 is mandatory.

In case of unannounced IFS Audits, if the audit window starts on or after 1st of September the audit shall be made according to IFS HPC v3.

In case of multi-location companies, all sites shall be audited to the same version as that of the central managing site.

IFS HPC v2 can still apply in the following exceptional situations:

- Audit of multi-location companies with central management where the audit of the central managing site started before the 1st of June 2023. If it is not possible to perform the central management audit according to v3, all sites shall be audited according to v2 too.
- Follow-up audit when the “main” audit was performed according to v2.
- Extension audit when the “main” audit was performed according to v2.

The authorisation of the aforementioned exceptional situations which permit the use of IFS HPC v2 after 1st of September 2023 shall terminate on 31st of August 2024.

CLARIFICATION ON PART 1 – 2.4 IFS HPC AUDIT OPTIONS

1.2.4 IFS HPC Audit options

1.2.4.2.1 Unannounced audit option

An unannounced audit registration will be deactivated in the IFS Database if nothing has been uploaded within three (3) months of the last possible date in the audit time window, even if a calendar entry has been made.

The certification body shall tick the box “Unannounced audit” in the IFS Database.

Once the audit has been performed, the certification body shall provide the audit dates in the database, within two working days of the last audit date at latest. This will ensure that the database users are informed that the audit has taken place and that the certification process is ongoing.

Note: In case the process is not followed accordingly, the certification body shall contact IFS Customer Support. Associated costs may apply.

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CLARIFICATION ON PART 2 – 4.16 TRACEABILITY

PART 2 – List of IFS HPC Audit Requirements

2.4 Operational processes

2.4.16 Traceability

2.4.16.3.1 Clarification about the requirement 4.16.3

The traceability system shall be tested at least once within a 12-month period or whenever significant changes occur. The test samples shall verify the complexity of the company's product range. The test records shall demonstrate upstream and downstream traceability (from delivered products to raw materials and vice versa). The traceability of the finished products shall be performed within a timeframe of four (4) hours maximum.

Clarification:

Objections with the timeframe shall be in compliance with customer requirements if less than four (4) hours are required.

CLARIFICATION ON PART 3 – 3.4.4 GENERAL RULES ABOUT AUDIT TEAMS

PART 3 – Requirements for accreditation bodies, certification bodies and auditors IFS Accreditation and Certification Process

3.3 Requirements for IFS HPC Auditors, Reviewers, In-house Trainers and Witness Auditors

3.3.4 Maintenance of auditor approval

3.3.4.4 General rules about audit teams

3.3.4.4.1 Use of a technical expert within an audit team

In exceptional cases, when a certification body does not have direct access to an IFS HPC Auditor with a qualification in the scope 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 HPC Auditor, and
- a technical expert

The technical expert shall meet the following criteria:

- Have a contract with the certification body for which the work is to be undertaken. The contract shall include a clause to ensure confidentiality and prevent a conflict of interest.
- Meet the criteria for work experience laid down in the IFS HPC Auditor qualification requirements (product scopes for IFS HPC Version 3).
- Have completed a training course in HACCP or risk assessment, as defined in the IFS HPC Auditor requirements or have demonstrable competence in these areas.
- Have received background training on IFS HPC from the certification body.

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// 3.3.4.4 Use of a technical expert within an audit team

The Certification Body 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 HPC Auditor shall be considered as the team leader. The technical expert must be accompanied during the whole audit by the IFS HPC Lead Auditor. The benefit for the IFS HPC Auditor is that this audit performed with an expert can be used as evidence when applying for a scope extension.
- The use of a technical expert shall be notified to auditor@ifs-certification.com at latest 14 days before the audit date.
- The technical expert shall appear on the IFS HPC audit report in the audit overview.

CLARIFICATION ON PART 4 – 1 REPORTING

PART 4 – Reporting, IFS Software and IFS Database

4.1 Reporting

4.1.1 IFS HPC Audit Report

4.1.1.1 How is the COID managed for companies in some specific cases?

- In the case of a multi-legal entity production site:
 - 1) multiple legal entities at one physical location with the same scope: one audit, separate COIDs, duplication of certificate and report.

The COIDs shall be mentioned in the audit overview of each audit report and linked in the IFS Database (visible for CBs only).
 - 2) multiple legal entities at one physical location with different scopes: separate COIDs, separate report and certificate.

The COIDs shall be mentioned in the audit overview of each audit report and linked in the IFS Database (visible for CBs only).

All audits shall be performed by one certification body.

The audit duration shall be calculated separately for each COID.
- In the case of multi-location production sites with or without a head-office: separate COIDs are created for each production site and linked in the IFS Database.

Note: In each case where the COIDs are linked, a notification will be sent out to those who marked the company as favourite.

In general, a new COID shall be created if the new legal entity is not taking over the rights from the previous legal entity (data protection issue). In such a case, the certification body decides if the old reports and certificate with the new legal entity is uploaded under the new COID (it will then be considered as an initial audit for the new COID).

- If a CB creates a new COID for a company with an already existing COID by mistake, they shall contact IFS Customer Support.

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// 4.1.1.1 How is the COID managed for companies in some specific cases?

- If a company has a new address but the same employees, same equipment, same processes: a new COID has to be created and a new audit shall be organised. The old audits are visible and clearly connected to the old COID. The access rights to the report, the action plan and the audits comparison are transferred to the new COID. Both COIDs will be linked in the IFS Database. The first audit performed at the new site is an initial audit. Therefore, the rule regarding 3 consecutive audits by the same auditor does not apply. The certification body decides whether the certificate of the “old” site shall be withdrawn as soon as production stops.
- If a company changes its legal entity but has the same address, same employees, same equipment, same processes: a new COID has to be created. The old audits are not visible but the old COID is provided. The access rights to the report, the action plan and the audits comparison are not transferred. The certification body decides if the old report and certificate with the new legal entity is uploaded under the new COID (it will be considered as an initial audit for the new legal entity) or if a new audit shall be carried out. The rule regarding 3 consecutive audits by the same auditor applies. The certification body decides whether the certificate of the “old” site shall be suspended as soon as production stops. It is recommended that the action plan of the “old” site is checked by the auditor especially in case of any product safety and quality management system deviation(s) and/or previous non-conformities.

The COID **shall not be changed** in the following cases:

- If a company maintains the same legal entity with the same employees, same production processes and just **changes the legal form** (example: Jelly LTD to Jelly LLP).
- If a company maintains the same legal entity with the same employees, same production processes and just **changes the company name** (example: Jelly sweet LTD to Jelly LTD) the COID shall not be changed.
- If the management of the company changes (new owner) but has the same employees, same equipment and the same processes: the CB shall perform a risk assessment and audit whether it is necessary to perform a “control-audit” to check that the current certificate is still ensured.

Contact details of the IFS Offices

GERMANY

IFS Office Berlin
Am Weidendamm 1A
DE- 10117 Berlin
Phone: +49 (0)30726105374
Email: info@ifs-certification.com

ITALY

IFS Office Milan
Federdistribuzione
Via Albricci 8
IT - 20122 Milan
Phone: +39 0289075150
Email: ifs-milano@ifs-certification.com

POLAND | CENTRAL EAST EUROPE

IFS Representative CEE Marek Marzec
IFS Representative Poland Beata Studzińska-
Marciniak
ul. Serwituty 25
PL - 02-233 Warsaw
Phone: +48 888787440
Email: ifs-poland@ifs-certification.com

CZECH REPUBLIC

IFS Representative Miroslav Šuška
Phone: +420 603893590
Email: msuska@qualifood.cz

BRAZIL

IFS Office Brazil
Rua Antônio João 800
BR - 79200-000 Aquidauana / MS Brazil
Phone: +55 67981514560
Email: cnowak@ifs-certification.com

NORTH AMERICA

IFS Representative Pius Gasser
Phone: +1 4165642865
Email: gasser@ifs-certification.com

FRANCE

IFS Office Paris
14 rue de Bassano
FR - 75016 Paris
Phone: +33 140761723
Email: ifs-paris@ifs-certification.com

SPAIN

IFS Representative Beatriz Torres Carrió
Phone: +34 610306047
Email: torres@ifs-certification.com

HUNGARY

IFS Representative László Gyórfi
Phone: +36 301901342
Email: gyorfi@ifs-certification.com

TÜRKIYE

IFS Representative Ezgi Dedevas Ugur
Phone: +90 5459637458
Email: ifs-turkiye@ifs-certification.com

ROMANIA

IFS Representative Ionut Nache
Phone: +40 722517971
Email: ionut.nache@inaq.ro

LATIN AMERICA

IFS Office Chile
Av. Apoquindo 4700, Piso 12,
CL - Las Condes, Santiago
Phone: +56 954516766
Email: chile@ifs-certification.com

ASIA

IFS Office Asia
IQC (Shanghai) Co., Ltd.
Man Po International Business Center Rm 205,
No. 660, Xinhua Road, Changning District,
CN - 200052 Shanghai
Phone: +86 18019989451
Email: china@ifs-certification.com
asia@ifs-certification.com

In case of any queries regarding the interpretation of IFS Standards and Programs, please contact standardmanagement@ifs-certification.com

