IFS HPC
version 3
Doctrine

VERSION 2

JUNE 2025

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 changes are described in the content overview on the first pages. If no changes are marked, it means the content was already 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 as "updated". In the digital version of the doctrine, links allow users to search for specific clarifications.

The numbering of the individual topics in the table of content is made up of the standard section and the chapter (e.g. 1-2.2 means part 1 of the standard, chapter 2.2). 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 from the moment the new version is applicable.

Certification bodies shall ensure that relevant certification body personnel are trained internally on the introduced changes according to their function within the certification body before the rules come into force.

Proof of this training shall be available on request. The duration of the training depends on the extent of the changes. IFS does not request any minimum length of time nor a specific tool to be used for the training as long as it is done face-to-face, online or by webinar (see part 3 of the Standard). Sending an email or a presentation in an email is not considered as a training.

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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

I) 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 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).

Note: In case of use of a professional interpreting service provider, IFS accepts that the respective interpreter doesn't have the required technical background. All further rules remain valid.

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

The language of the report is allowed to be solely in English if the company has agreed to this. If the customer wish to have a report in the working language of the company, it shall be complied together with an interpreter is necessary.

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.

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 – 2.1 MAKING A CONTRACT WITH A CERTIFICATION BODY

1-2.1   Making a contract with a certification body

II)   Auditor sharing

There are two (2) possibilities to share auditors between certification bodies:

1) Borrowing of auditors

For the occasional sharing of auditor, both certification bodies shall compose a short agreement concerning the lending/borrowing of the auditor. The agreement shall contain at a minimum:

- Day of audit

- Name and COID of company

- Name of shared auditor

- Signature of both certification body managers of the IFS contracted certification bodies

- Signature of a responsible person to IFS from both IFS contracted organisations

The agreement shall be sent to the IFS Office at least two (2) weeks before the IFS Audit is performed.

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 (2) 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 – 2.2 SCOPE OF THE IFS HPC AUDIT

1-2.2　Scope of the IFS HPC Audit

I)　**Clarification on the coverage of the standard:**
How does a certification body determine whether or not
a textile-based HPC product falls within the scope
of the HPC 3 audit?

Annex 3 of the IFS HPC Standard states that 'clothes and textiles' are not covered by the IFS HPC Standard. However, recognition as to whether a product is considered a textile material according to the definition in the Textile Labelling Regulation ((EU) No 1007/2011) is not always consistent. In order to harmonise the approach, the decision shall be made on the intended use of the product (and not on the material composition).

Products that are intended exclusively for cleaning/polishing the household or body and that are not pre-charged can be considered under product scope 3 or 4 (e.g. floor cloths, colour collector cloths, window cloths, all-purpose cleaning cloths, dishcloths, wash cloths etc.). Other textiles like clothing or clothes, personal protective equipment and decorative textiles (such as bed linen, tablecloths, place mats) are not covered by the scope of the IFS HPC Standard.

Apart from the known legislations for textile-based products for scope 3 and 4 (REACH, General Product Safety Regulation etc.) certification bodies shall additionally take into account the Textile Labelling Regulation and its amendments and train their HPC auditors accordingly to ensure awareness of current legislation.

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

1-2.2 Scope of the IFS HPC Audit

II) 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		• Detergents used for cleaning activities in different industries • Dyes used at hairdressers	• Jumbo paper reels to produce e.g. napkins or toilet paper • Plastic films sheets made of polyethylene, PVC etc to form plastic bags **Note:** Processes like e.g. cutting, printing, folding, whitening, adding chemical agents etc characterise further transformation	• Sulfuric acid • Boric acid etc.	• Cosmetic or detergent base **Note:** Processes like simple filling/ packing and labelling characterise minor changes
	Included	Included	Not included	Not included	Included

Read more on next page

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If the production of raw material (e.g. paper jumbo reels, mother reels, plastic film sheets etc.) is a core process of the company being certified, this can be mentioned in the scope, as long as it is clear and unambiguous that these products are not considered as one of the final products of the company.

E.g. Manufacturing of raw material (paper jumbo reels) and conversion (cutting, printing, folding) into napkins and kitchen rolls packed in paper card boxes and PP foil.

Raw material (e.g. paper jumbo reels, mother reels, plastic film sheets etc.) manufactured and sold as B2B products are not covered by the IFS HPC Standard.

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.

CLARIFICATION ON PART 1 – 2.3 TYPE OF HPC AUDITS

1-2.3   **Type of HPC Audits**

1-2.3.3   **Follow-up audit**

I)   **Situations where a remote follow-up audit is acceptable**

The certification body can decide to perform a remote follow-up audit based on a risk assessment and a proper documented justification. This justification shall be available upon request.

The IFS Split Audit Protocol and the Split Audit checklist for the relevant standard shall be used to decide which requirements can be audited remotely and which will need to be audited on-site.

CLARIFICATION ON PART 1 – 2.3 TYPE OF HPC AUDITS

1-2.3.3   Follow-up audit

II)   **Situations where it is acceptable to perform a follow-up audit in less than six (6) weeks**

The certification body can decide to carry out a follow-up audit earlier than six (6) weeks and as early as two (2) weeks after the last day of the main audit if it is based on a risk assessment and a proper documented justification. This justification shall be available upon request.

CLARIFICATION ON PART 1 – 2.4.2 UNANNOUNCED AUDIT OPTION

1-2.4 IFS HPC Audit options

1-2.4.2 Unannounced audit option

Clarification about the unannounced audit registration

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. In case there was no calendar entry, the registration is directly deactivated after the last day of the audit window.

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

When the audit has been performed, the certification body shall provide the audit dates in the database, at latest within two (2) working days of the last audit date. 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. It has to be considered that associated costs may apply.

CLARIFICATION ON PART 1 – 4.2.1 SCORING AND CONDITIONS FOR ISSUING THE IFS AUDIT REPORT AND IFS CERTIFICATE

1-4   Post IFS HPC Audit actions

1-4.2.1   Scoring and conditions for issuing the IFS Audit Report and IFS Certificate

Situations where an audit is considered cancelled

An audit shall be considered cancelled if the audit is stopped before the IFS Audit Checklist is completed.

In the case of a cancellation, the following rule shall apply:

- Withdrawal of the current certificate (within two (2) working days)
- No new certificate is issued
- The audit does not count towards the "maximum three (3) consecutive IFS Audits by the same auditor" rule
- A new initial audit may be performed after a minimum of six (6) weeks

The report shall be completed (until the point the audit was stopped), reviewed and uploaded to the IFS Database. In case of deviation(s) and/or non-conformities scored in the report, it shall be reviewed by the auditor before the next audit, together with the last certification audit report.

PART 2 – List of IFS HPC Audit Requirements

2-4   Operational processes

2-4.16   Traceability

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.

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CLARIFICATION ON PART 3 – 1.1 GENERAL REQUIREMENTS (FOR ACCREDITATION BODIES)

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

3-1   Requirements for the accreditation bodies

3-1.1   General requirements

Clarification in case of a suspension or withdrawal of a certification body's accreditation

Accreditation bodies shall inform IFS if a certification body has its accreditation in relation to an IFS Standard suspended or withdrawn.

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CLARIFICATION ON PART 3 – 3 REQUIREMENTS FOR IFS HPC AUDITORS

3-3 Requirements for IFS HPC Auditors, Reviewers, In-house Trainers and Witness Auditors

3-3.1 Requirements for IFS HPC Auditors

Clarification about specific type of audits which are not accepted for a sign-off audit and witness audit

A multi-location audit, cannot be used for a sign-off audit, because the checklist is not completely audited (central management processes).

Extension audits are not acceptable for witness audits.

CLARIFICATION ON PART 3 – 3.1.4 SIGN-OFF AUDIT

3-3.1   **Requirements for IFS HPC Auditors**

3-3.1.4   **Sign-off audit**

Clarification on certificate validity

The certificate validity starts from the date of activation in the IFS Database and is based on the date of passing the written IFS HPC Examination process (general exam plus at least one scope exam). The validity stops at the end of the second calendar year of the IFS HPC Examination process, irrespective of the date of activation as an IFS HPC Auditor.

CLARIFICATION ON PART 3 – 3.4.4 GENERAL RULES ABOUT AUDIT TEAMS

3-3.4   **Maintenance of auditor approval**

3-3.4.4   **General rules about audit teams**

Use of a technical expert within an audit team

In the exceptional case where a certification body does not have direct access to an IFS HPC Auditor qualified in the required scope, or it is not possible to 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.

Read more on next page

// **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 3 – 3.5 REQUIREMENTS FOR IFS REVIEWERS, IN-HOUSE TRAINERS AND WITNESS AUDITORS

3-3.5 **Requirements for IFS Reviewers, In-house Trainers and Witness Auditors**

Clarification related to calibration training of IFS HPC Reviewer (a) and In-house trainer (b)

If not an IFS HPC Auditor, the IFS HPC Reviewer or In-house trainer shall participate at a one (1) day online IFS Calibration Training for reviewers/in-house trainer organized by IFS, every two years. The first IFS Calibration Training shall be completed in the second calendar year following the date of the initial approval.

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CLARIFICATION ON PART 4 – 1.1 IFS HPC AUDIT REPORT: AUDIT OVERVIEW (ANNEX 9)

PART 4 – Reporting, IFS Software and IFS Database

4-1 Reporting

4-1.1 IFS HPC Audit Report: audit overview (Annex 9)

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

In the case of a multi-legal entity site:

- 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).

- at one physical location with different scopes: multiple audits, separate COIDs, separate reports and certificates. The COIDs shall be mentioned in the audit overview of each audit report and linked in the IFS Database (visible for CBs only). The audit duration shall be calculated separately for each COID.

    All audits shall be performed by one certification body.

In the case of multi-location sites:

- separate COIDs are created for each site and linked in the IFS Database.

CLARIFICATION ON PART 4 – 1.1 IFS HPC AUDIT REPORT: AUDIT OVERVIEW (ANNEX 9)

4-1.1 IFS HPC Audit Report: audit overview (Annex 9)

II) When shall a new COID be created?

A new COID shall be created in two cases: change of address and under specific circumstances, change of the legal entity.

If a site (physical activities) **moves to a new address,** a new COID shall be created and an initial audit shall be organised. The certification history will be visible but remains connected to the original COID. The access rights to the report, action plan and audit comparison are transferred to the new COID. If a new audit is organised, the first audit performed at the new site is a first initial audit. The certification body decides whether the current certificate of the old site shall be withdrawn.

If a company **changes its legal entity** and under the prerequisite that the new legal entity **has no contract** with the prior regulating data protection issues, a new COID shall be created, and the certification body shall evaluate the certification status. The certification history is invisible, but the old COID is provided. The access rights to the report, action plan and audit comparison are not transferred. It is recommended that the action plan of the prior audit is checked by the auditor. Especially in case of any product safety and quality management system deviation(s) and/or previous non-conformities.

Under the **prerequisite** that the new legal entity is **not in conflict with data protection rights,** the COID shall not be changed. In this case the certification body shall update the information in the IFS Database.

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// IFS HPC Audit Report

	New address	New legal entity	
	new COID linked with old	not taking over rights* = new COID not linked	taking over rights* ≠ no new COID
New audit?	An initial audit shall be organised.	Certification body evaluates the situation.	Certification body evaluates the situation.
Certification history	Remains visible via the link to the old COID.	Is invisible, but the old COID is provided in the report.	Remains unchanged.
First audit after change	First initial audit	First initial audit	According to standard
Further information	Certification body decides whether the certificate shall be withdrawn when production at the old site stops. COIDs can only be linked once.	It's recommended that the action plan of the current 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 certification body changes the information in the IFS Database, updates the information in the AXP file and on the certificate (to be sent to CS).

The Regulation on the protection of undisclosed know-how and undisclosed information is valid in the European Union. In other parts of the world different legislation may apply.

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

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CLARIFICATION ON PART 4 – 1.4 MINIMUM REQUIREMENTS FOR THE IFS CERTIFICATE (ANNEX 11)

4-1.4   Minimum requirements for the IFS Certificate (Annex 11)

I)   Clarification about the headquarter/central management information on the certificate

The headquarter/central management name including its address shall be written on the IFS Certificate and indicated as such in case one of the below is applicable:

- The headquarter/central management is responsible for certain central management system elements and is audited for that, being part of the IFS Multi-location approach.

- The headquarter/central management is not responsible for certain central management system elements but according to ISO/IEC 17065:2012 norm is the legal responsible "client" for the audit(s) of the processing site(s) and is having a contract with the certification body.

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CLARIFICATION ON PART 4 – 1.4 MINIMUM REQUIREMENTS FOR THE IFS CERTIFICATE (ANNEX 11)

4-1.4   **Minimum requirements for the IFS Certificate (Annex 11)**

II)   **Clarification on the definitions of dates on the certificate**

The certificate issue date is the original date on which the certificate was first issued.

The date and place, called "Signature date" is the most recent date the certificate was updated due to a significant change, such as in case of an extension audit or change in the scope.

Corrections, such as typographical errors shall not affect the signature date.

ALL CLARIFICATIONS   >

4-3   The IFS Database

Form for extraordinary information

The following shall be added in the description of the extraordinary information:

- Company (COID)
- Product (including private labels and/or brands);
- Date of recall/withdrawal;
- Involved batches;
- Reason of the recall/incident

After ten (10) working days from the initial information in the IFS Database:

- Cause of the incident (if relevant with corrections and corrective actions taken by the company)
- The actions taken by the certification body. Especially with reference to the certification status of the company

CLARIFICATION ON ANNEXES – ANNEX 1 SCOPE OF APPLICATION OF THE DIFFERENT IFS STANDARDS AND IFS PROGRAMS

Annex 1 Scope of application of the different IFS Standards and IFS Programs

Scope determination between IFS PACsecure and IFS HPC Standard

To support Certification Bodies (CBs) in distinguishing between IFS HPC Scope 3 and PACsecure products produced within the same company, the following guidance and criteria apply:

IFS HPC: Applies if products are designed and sold empty through retailers or final distributors directly to consumers.

IFS PACsecure: Applies if products are designed to be filled at the point of sale and used as service packaging.

Both: If both cases apply, a combined audit can be conducted under specific conditions. Please contact IFS Standard Management (standardmanagement@ifs-certification.com) for more information. All rules related to combined audits apply.

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