IFS PACsecure

# IFS PACsecure version 3 Doctrine

**VERSION 1**

MAY 2024

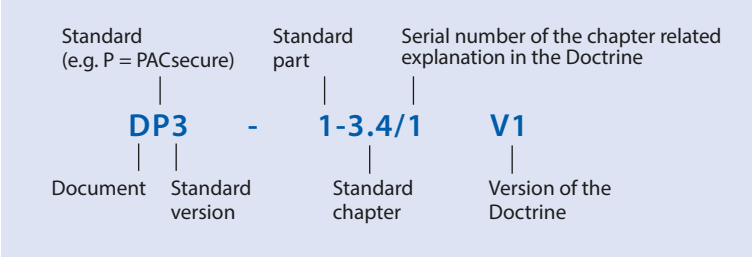
ENGLISH

# Foreword

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

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 PACsecure", 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 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. DP3-1-3.4/1 V1 means the document is the first IFS PACsecure Doctrine explanation which refers to the chapter 3.4 in the first part of the IFS PACsecure Standard 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 in the previous doctrine version.
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 is trained internally 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.
The duration of the training depends on the extend 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 PACsecure Certification Protocol

### 1.2 Before the IFS PACsecure Audit

#### 1.2.1 Making a contract with a certification body

##### 1.2.1.1 Rules for the usage of an interpreter 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, it is mandatory to use an interpreter under the following conditions:

- The interpreter shall have a technical background or 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.
- 20 % of the total audit duration shall be added to ensure proper audit performance.

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

## 1.2.1.2 Auditor sharing

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

**1) Borrowing of auditors**

For the occasional sharing of auditors, 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 of the company 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 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 audit, training of auditors, reviewing etc. are clearly separated. Only audit date and scope can be seen by the partner; company names are invisible.

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

## 1.2.1.3 Use of a technical expert within an audit team

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 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

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 laid down in the IFS PACsecure Auditor qualification requirements (product scopes for IFS PACsecure version 3).
- Have taken part in a food hygiene and HACCP course, as defined in the IFS PACsecure Auditor Requirements or have demonstrable competence in these areas.
- Have taken part in the "IFS PACsecure Standard for Auditors" eLearning course.

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 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 audit overview.

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# CLARIFICATION ON PART 1 – 2.2 SCOPE OF THE IFS PACSECURE AUDIT

## 1.2.2 Scope of the IFS PACsecure Audit

### 1.2.2.1 Which IFS PACsecure Standard version shall be applied in some specific situations?

In case the audit starts on or after 1 July 2024, IFS PACsecure version 3 Audits are possible.

In case the audit starts on or after 1 October 2024, IFS PACsecure version 3 is mandatory.

In case of unannounced IFS Audits, if the audit window starts on or after 1 October 2024 then the audit shall be performed according to IFS PACsecure version 3.

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

Exceptional situations where the IFS PACsecure version 2 can still apply are the following:

- Audit of multi-location companies with central management where the audit of the central managing site started before the 1 July 2024. If it is not possible to perform the central management audit according to version 3, all sites shall be audited according to version 2 too, also sites having unannounced audits where one or several site(s) has/have their audit window starting on or after 1 October.
- Follow-up audit when the "main" audit was performed according to version 2.
- Extension audit when the "main" audit was performed according to version 2.

The general admission of the aforementioned exceptional situations which permit the use of IFS PACsecure version 2 after 1 October 2024, shall terminate on 30 September 2025.

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# CLARIFICATION ON PART 1 – 2.2 SCOPE OF THE IFS PACSECURE AUDIT

## 1.2.2.2 Examples of how to write the audit scope

The audit scope shall include:

- the most characteristic processes that differentiate the product from others and which are not self-explanatory,
- the different types of products, in sufficient detail,
- the type of wrapping materials that are in contact with products,
- the intended use of products (primary and/or secondary packaging materials).

Some examples of correct (☑) and incorrect (☒) audit scope descriptions are:

| | |
|---|---|
| ☑ | *Production of standard and coloured glass bottles in wide and narrow neck formats (melting, moulding by the press and blow for wide necks and blow-blow for narrow necks, and coating) packed in wooden pallets with cardboard sheets and wrapped in PE stretch film, to be used in alcoholic and non-alcoholic beverages* |
| **Note:** the intended use described is sufficient to clarify that the product will be used as "primary packaging". | |
| ☑ | *Sheeting, lithographic and flexographic printing, die-cutting and folding/glueing of folding cartons, packed in wooden pallets and wrapped in plastic stretch film, to be used as primary packaging in food/non-food industries and secondary packaging in non-food industries* |
| ☒ | Design & manufacture of rigid plastic packaging (Injection Stretch Blow Molding, Injection Blow Molding) and closures (Injection Molding). Products are intended to be used in the food and non-food industry |
| **Note:** The type of wrapping materials and intended use of products are missing. Also, certain activities of a production site are always part of the IFS PACsecure Audit and shall, therefore, not be mentioned specifically – "Design" shall not be included. | |
| ☒ | *Laminating, converting and finishing of polyester, polyethylene, nylon, paper and/or compostable films to manufacture lidding film, shrink sleeves, heat and cold seal roll stock, and pouches as primary and secondary packaging in food and non-food industries"* |
| **Note:** *The scope of the audit shall not include references to claims – "Compostable" shall not be included.* | |

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# CLARIFICATION ON PART 1 – 2.2 SCOPE OF THE IFS PACSECURE AUDIT

## 1.2.2.3 Clarification on how to explain special situations in the report where the same or similar raw materials are bought to the product processed/converted by the audited production site

**Example:** A company manufactures corrugated cardboard containers and sheets.

If the audited production site produces corrugated cardboard sheets, which are also bought as raw material to produce corrugated cardboard containers:

- the situation shall be clearly explained in the report (company profile, additional information)
- it shall be stated that the finished product is made of corrugated cardboard sheets that are produced by the audited production site as well as purchased as raw material.

If the audited production site produces corrugated cardboard sheets, which are also produced on behalf of the certified site as partly outsourced processes:

- the sentence "Besides own production, the company has partly outsourced processes" shall be added to the certificate
- a description of the partly outsourced processes shall be given in the report.

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# CLARIFICATION ON PART 1 – 2.4.2 UNANNOUNCED AUDIT OPTION

## 1.2.4 IFS PACsecure Announced and Unannounced Audit

### 1.2.4.2 Unannounced audit option

#### 1.2.4.2.1 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 day of 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.

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, two (2) working days after the first audit day. 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 1 – 3.1 AUDIT DURATION

## 1.3 IFS PACsecure Audit Realisation

### 1.3.1 Audit duration

#### 1.3.1.1 Rules to extend or reduce the audit duration

The minimum duration of an IFS PACsecure Audit shall be two (2) days (16 hours) without audit preparation and reporting time. However, in specific situations, the audit duration can be extended or reduced; in such cases, the following rules apply.

**1) Rules to extend the audit duration**

Due to the size of the production area

- If the production area is between 5000m$^2$ and 10000m$^2$, a minimum of four (4) hours shall be added (in addition to the two (2) days (16 hours)).
- If the production area is over 10000m$^2$, a minimum of eight (8) hours shall be added (in addition to the two (2) days (16 hours)).

Some examples of other factors which may lead to an extension of the minimum audit duration are the following:

- Initial audit – the auditor may require additional time, for example, during the opening and closing meetings.
- Number of production lines
- Complexity of the production/conversion processes
- Communication issues, e.g. language, ICT (in case of IFS Split Audit)
- Quality of production site preparation, e.g., documentation, hazard and risk management system
- Number deviations/non-conformities from the previous audit
- Issues during the audit that require further investigation
- Additional storage facilities, locations

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## // 1.3.1.1 Rules to extend or reduce the audit duration

**2) Rules to reduce the audit duration**

In specific situations, and only in the following limited cases, the certification body may decide to reduce the minimum audit duration by 0,5 days:

- IFS Combined Audits: e.g. IFS PACsecure/IFS Logistics, IFS PACsecure/IFS Broker, under the condition that some parts are commonly audited for both standards.
- Multi-location companies, if some requirements have already been audited at the head office/central management site.
- Multi-legal entity production site: if the legal entities have different scopes at one physical location and a head office/central management has been appointed.
- For the main audit of a site where an extension audit shall be performed every year, due to seasonal products/processes.
- For sites where it was not possible to audit all processes during an unannounced audit and therefore an extension audit shall be performed later.

The certification body/auditor shall justify the decision for a reduction in the IFS Audit Report.

In case of exceptional circumstances, a maximal reduction of up to 0,75 days (6 hours) of the minimum audit duration can be applied. The application of this rule by the certification body shall be a case-by-case and risk-based decision, and the decision for a reduction shall be justified in the IFS Audit Report. Some examples of these exceptional circumstances are the following:

- Size of the site
- Scope of the audit
- Number of production lines involved
- Total number of employees
- If only simple processes are carried out at the site.

**Note:** "*Simple processes*" are limited to processes:

- in which the activities carried out do not significantly modify the products from their original input form (e.g. glueing, cutting, folding, sorting, marking, labelling and wrapping, etc.)
- where there is no control measure identified which is essential to control a significant hazard for product safety.

A combination of different reasons for reduction is not possible, even in the case of a combined IFS Audit.

The IFS Integrity Program will regularly review the justifications for audit time reduction, to ensure they are relevant and aligned with the above rules.

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# CLARIFICATION ON PART 3 – 3.1.5 MAINTENANCE OF AUDITOR APPROVAL

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

### 3.3 Requirements for IFS PACsecure Auditors, IFS PACsecure Reviewers, IFS PACsecure Trainers and IFS PACsecure Witness Auditors

#### 3.3.1 Requirements for IFS PACsecure Auditors

#### 3.3.1.5 Maintenance of auditor's approval

#### 3.3.1.5.1 Clarification on the maintenance of auditor approval in certain specific situations

As an exceptional case, IFS will recognise the audits performed as lead-or co auditor in other GFSI recognised standards in packaging related scope as valid as long as one (1) of these five (5) audits is an IFS PACsecure Audit; nevertheless, certification bodies shall do the utmost to perform as many IFS PACsecure Audits per auditor as possible.

In case of any other special situations, it is mandatory to contact IFS Auditor Management for a case-by-case decision.

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# CLARIFICATION ON PART 3 – 3.6 AUDITS NOT ACCEPTED FOR A SIGN-OFF AUDIT, WITNESS AUDIT AND AUDITOR SCOPE EXTENSION

## 3.3.6 Overview of requirements for initial approval and maintenance of approval and the tasks of each IFS related role in a certification body

### 3.3.6.1 Clarification about specific types of audits which are not accepted for a sign-off audit, witness audit and auditor scope extension

A multi-location production site 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 or auditor scope extensions.

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# CLARIFICATION ON PART 4 – 1.1 MINIMUM REQUIREMENTS FOR THE IFS AUDIT REPORT

## PART 4 – Reporting, the IFS Software and IFS Database

### 4.1 Reporting

#### 4.1.1 Minimum requirements for the IFS Audit Report

##### 4.1.1.1 A) 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.

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

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# CLARIFICATION ON PART 4 – 1.1 MINIMUM REQUIREMENTS FOR THE IFS AUDIT REPORT

## 4.1.1.1 B) When shall a new COID be created?

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

If a production site **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.
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 as soon as production stops.

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 evaluates 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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### // 4.1.1.1 B) When shall a new COID be created?

| | 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** | Contact IFS Customer Support (CS) to link the COIDs.<br>Certification body decides whether the certificate shall be withdrawn when production at the old site stops.<br>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 food 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 – 1.1 MINIMUM REQUIREMENTS FOR THE IFS AUDIT REPORT

## 4.1.1.2 Which information of the report shall be translated into English?

The following information of the report shall be translated into English:

- Company profile (company data + audit data)
- Audit scope
- Partly outsourced processes
- Exclusions
- Overall summary of compulsory information
- Deviations and non-conformities

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# CLARIFICATION ON PART 4 – 1.1 MINIMUM REQUIREMENTS FOR THE IFS AUDIT REPORT

## 4.1.1.3 Clarification about compulsory fields and additional information to be provided in the audit requirements

To align IFS PACsecure to all IFS Standards, there are modifications in some of the existing compulsory fields and additional information has been added to specific IFS PACsecure 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 modified and additional content will give more precise information about the auditee. This will add value for every user/reader of the IFS Report. During an audit and even in the case of an A evaluation, the auditor is requested to provide, additional justification and/or further background information for these specific requirements for the audited production site.

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## // 4.1.1.3 Clarification about compulsory fields and additional information to be provided in the audit requirement

The compulsory fields modified or added in Annex 10 "Overall summary: Table of compulsory fields for specific defined IFS PACsecure Audit Requirements and Key Elements" are detailed in the following table:

| Modified / Added | Part of the IFS Audit Report | N° of IFS PACsecure version 3 Requirement | Compulsory information to be added |
|---|---|---|---|
| **Modified**<br>The requirement 4.3.2 is replaced by the requirement 4.3.5 | Product development | 4.3.5<br>~~4.3.2~~ | Summary* |
| **Modified**<br>In the compulsory information to be added, information related to the usage of recycled material, plant-based material, or functional additives is added | Special claims/ statements | 4.2.1.5 | • There are specific requirements from clients for claims: [yes/no]/ [list]<br>• There are specific requirements from clients that certain treatment or manufacturing methods are excluded: [yes/no]/[list]<br>• The company works with products that consist of, contain, or are produced from recycled material, plant-based material, or functional additives: [yes/no] / [list] |
| **Added**<br>Alignment with IFS Standards. | Plant layout and process flow | 4.8.2 | Summary* |
| **Modified**<br>The requirement 5.3.3 is replaced by the requirement 5.3.5, and the related compulsory information to be added is modified accordingly. | Process validation and control | 5.3.5<br>~~5.3.3~~ | • The company has printed information on products? [yes/no]<br>• The company has critical information printed on products [yes/no]<br>  • If No: * Summary<br>  • If Yes: Products and type of critical information printed (ingredient list(s), allergens, identification code, other(s)) |

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# CLARIFICATION ON PART 4 – 3 THE IFS DATABASE

## 4.3 The IFS Database

### 4.3.1 Form for extraordinary information to be filled out by the certification bodies

The following information needs to be added in the description:

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

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.

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