

IFS Food Version 7 Doctrine



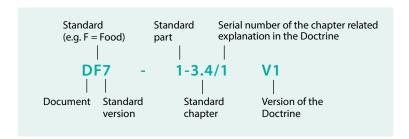


Foreword

This document provides additional clarification to the IFS Food 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 Food", and the number 7 for the "Standard version 7". The second section of the name specifies the part of the Standard to which the document refers (the IFS Food 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. DF7-1-3.4/1 V1 means the document is the first IFS Food Doctrine explanation which refers to the chapter 3.4 in the first part of the IFS Food version 7.



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 Food v6.1 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 is 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.



Doctrine number	Title	Document name	Comments
0.0	Introduction		
0.0.1	General clarification about the possibility to perform part of the IFS Assessment remotely	DF7-0-0/1 V1	NEW
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1.2.2	Scope of the IFS Food Assessment		
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1.2.2.3	Is it possible to certify a mobile bottling company?	DF7-1-2.2/3 V1	DF6.1-1-4.6/1 V1
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1.2.2.6	Clarification about the IFS Food Assessment scope and the processing steps in case of outsourced processes	DF7-1-2.2/6 V1	NEW
1.2.2.7	Clarification about logistics activities in case of fully outsourced products and/or traded products	DF7-1-2.2/7 V1	NEW
1.2.2.8	Clarification about how to differentiate a raw	DF7-1-2.2/8 V1	NEW

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material from food coming from partly out-

sourced processes



Doctrine number	Title	Document name	Comments
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1.3.1.5	What is the definition of "total number of employees"?	DF7-1-3.1/5 V1	DF6.1-1-5.3/4 V1
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Doctrine number	Title	Document name	Comments
Annex 1	Scope of application of the different IFS Standards and IFS Program		
Annex 1.1	Clarification about the scope determination between IFS Food and IFS Logistics in regards to labelling	DF7-Annex1/1 V1	NEW
Annex 3	Product and technology scopes		
Annex 3.1	When to apply the process step P2 and P11?	DF7-Annex3/1 V1	
Annex 10	IFS Assessment report: Main content		
Annex 10.1	Clarifications on certain compulsory fields	DF7-Annex10/1 V1	NEW
Annex 12	Glossary		
Annex 12.1	New definition about claims	DF7-Annex12/1 V1	NEW
Annes 12.2	Clarification about the primary packaging material definition	DF7-Annex12/2 V1	NEW

DF7-0.0/1 V1

CLARIFICATION - 0.0 INTRODUCTION

0.0 Introduction

0.0.1 General clarification about the possbility to perform part of the IFS Assessment remotely

The Information and Communication Technologies (ICT) have made remote assessing more enforceable.

In order to support situations were a complete regular on-site IFS Assessment at the physical site is hardly possible to realise (e.g. restrictions and limitations due to the pandemic situation), IFS explored the possibility to conduct IFS Split Assessments with a first on-site assessment and a second remote part. The reason why the option of the IFS Split Assessment is chosen, shall be clearly mentioned in the IFS Assessment report.

The use of ICT for assessing will only be successful if the right conditions are in place. Therefore, the document "IFS Split Assessment Protocol" is a normative document created in addition to the IFS Standard and IFS Doctrine to ensure a robust Assessment process by applying ICT for the evaluation of the relevant IFS Standard requirements by a certification body/auditor.

Certification bodies/auditors are obliged to fully comply to the requirements set out in this document (including additional auditor qualification as laid down in chapter 7).

The IFS Split Assessment option can be applied from the date of the protocol publication.

DF7-1-0.0/2 V1

CLARIFICATION - 0.0 INTRODUCTION

Clarification for companies in case of initial assessments and 0.0.2 first assessments according to a new version

In an IFS Food version 7 Assessment, the site is assessed to the requirements of IFS Food version 7 and the auditor has to evaluate the site's implementation of those requirements.

Following this, all rules and requirements of the Standard including those where an annual review is requested shall be implemented and validated (e.g. through internal audits, senior management review, etc.) before the annual certification assessment. In case of an unannounced assessment, all Standard requirements need to be implemented before the assessment time window starts.

DF7-1-2.1/1 V1

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

PART 1 – IFS Food Certification Protocol

- 1.2 **Before the IFS Food Assessment**
- Making a contract with a certification body 1.2.1
- 1.2.1.1 Are there any IFS rules for the use of interpreters during an **IFS Food Assessment?**

An IFS Food Assessment shall be carried out in the language of the production site. The use of an interpreter is not allowed if the production site language is:

- German
- French
- English
- Chinese
- Italian
- Spanish (exempted Central and South America)

In general, the Assessment shall preferably be carried out in the 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 food safety/quality standard.
- · The interpreter shall be independent from the assessed company to avoid any conflict of interest.
- 20% of the total Assessment duration shall be added to ensure proper Assessment performance.

DF7-1-2.1/2 V1

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

1.2.1.2 Auditor sharing

To cover all the necessary product and technology scopes of an Assessment, 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 Assessment
- name 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.

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

DF7-1-2.1/3 V1

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

1.2.1.3 Uploading documents during the process of borrowing auditors: new system

The auditXpressX[™] version allows a selection of all IFS Standard related approved auditors.

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

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

DF7-1-2.1/4 V1

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

Use of a technical expert within an Assessment team 1.2.1.4

In exceptional cases, e.g. when a CB does not have direct access to an IFS Food Auditor with a qualification in the scope required or cannot sign a short term contract with another CB to access their auditors, IFS allows the following exception. Assessments may be carried out by a team consisting of:

- an approved IFS Food Auditor, and
- a technical expert.

This exception is valid until further notification in all countries outside of Europe. The technical expert shall meet the following criteria:

- Have a contract with the CB for which the Assessment 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 Food Auditor qualification requirements (product and technology scopes for IFS Food version 7).
- Have completed a training course in HACCP or Risk Assessment, as defined in the IFS Food Auditor requirements or have demonstrable competence in these areas.
- Have received background training on IFS Food from the certification body.

The CB shall also ensure the following requirements are met:

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

DF7-1-2.2/1 V2

CLARIFICATION ON PART 1 – 2.2 SCOPE OF THE IFS FOOD ASSESSMENT

PART 1 – 2.2 Scope of the IFS Food Assessment

1.2.2.1 Clarification about the description of the IFS Food Assessment scope

The IFS Food Asssessment scope shall include the most relevant technologies in order to describe the products and processes (cf. Annex 3) unambiguously including the packaging and labelling (when applicable).

The word "labelling" should be written in the scope in case it is essential to describe the processes of the company (e.g. only relevant processing step of the company).

In addition to the explanations given in the standard, some words shall not appear in the Assessment scope.

For example, storage, transport, sales, distribution, R & D, development/design shall not be mentioned, as these topics will be investigated in an IFS Food Assessment.

If the storage is linked to a processing step, this step should be described without using the word storage, for example "ripening/maturation process".

Furthermore, brand information is not allowed in the Assessment scope as it does not provide a detailed description of the product category. It can only be mentioned in the company profile of the report.

DF7-1-2.2/2 V2

CLARIFICATION ON PART 1 – 2.2 SCOPE OF THE IFS FOOD ASSESSMENT

1.2.2.2 Which IFS Food Standard version shall be applied in some specific situations?

From 1st of March 2021 IFS Food v7 Assessments are possible.

From 1st July 2021 IFS Food v7 is mandatory. In case the Assessment ends on or after 1st July 2021, it shall be according to IFS Food v7.

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

Exceptional situations where the IFS Food v6.1 can still apply are the following:

- Assessment of multi-location companies with central management where the Assessment of the central managing site is performed before the 1st March 2021. All efforts shall be made that the Assessment of the central managing site is performed after the 1st March 2021 according to IFS Food v7. In case this is not possible, justification shall be provided to IFS by the responsible certification body. This exception is applicable also in case of multi-location companies having unannounced Assessments where one or several site(s) has/have their Assessment window starting on or after 1st of May.
- Follow-up Assessment when the "main" Assessment took place before 1st July 2021 (and was performed according to V.6.1)
- Extension Assessment when the "main" Assessment took place before 1st July 2021 (and was performed according to V.6.1)

The general admission of the aforementioned exceptional situations which permit the use of IFS Food V6.1 after 1st July 2021, shall terminate on 30th June 2022.

In case of unannounced IFS Assessments, if the Assessment window starts on or after 1st May then the Assessment shall be made according to IFS Food v7.

DF7-1-2.2/3 V1

CLARIFICATION ON PART 1 – 2.2 SCOPE OF THE IFS FOOD ASSESSMENT

1.2.2.3 Is it possible to certify a mobile bottling company?

It is not possible to certify a company providing a service. The wineries which use a mobile bottling service and want to have it in the certificate scope shall declare this to the certification body and request to organise the IFS Assessment during the bottling step and assess the mobile service when in operation at the production site. In case the Assessment is unannounced, an extension Assessment shall be conducted to be able to include this step in the scope. In addition, the bottling service provider shall be covered by the HACCP of the company.

A clear description and the name of the bottling company shall be provided in the company profile.

The type of product being bottled at the time of operation shall be written on the scope of the certificate (e.g. if it was for a specific production line: bottling of white wine in 0,5 l glass bottles).

DF7-1-2.2/4 V1

CLARIFICATION ON PART 1 – 2.2 SCOPE OF THE IFS FOOD **ASSESSMENT**

1.2.2.4 Which Assessment scope applies for a company which produces a wide range of prepacked products with more than 3 product scopes with High Pressure Processing (HPP)?

> In such a case, the following scopes shall be chosen: product scope 7 and processing step P2.

DF7-1-2.2/5 V1

CLARIFICATION ON PART 1 – 2.2 SCOPE OF THE IFS FOOD **ASSESSMENT**

1.2.2.5 How is a situation managed where a deviation, which had been identified during the head office/central managing site Assessment, has been solved and checked by the auditor during the site Assessment?

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

- The respective central managed process can also be checked completely at the production site and the previously rated deviation at the central managing site can be solved with objective evidence.
- The check of corrective actions which allow the deviation to be solved, shall be carried out during the Assessment of all sites.
- The auditor needs time to check the implementation of corrective actions for this previously noticed deviation at the head office/central managing site. More than likely a full reduction of Assessment time (0,5 days) would no longer be applicable (as would be possible in a normal situation). This decision is the responsibility of the certification body.

DF7-1-2.2/6 V1

CLARIFICATION ON PART 1 – 2.2 SCOPE OF THE IFS FOOD ASSESSMENT

1.2.2.6 Clarification about the IFS Food Assessment scope and the processing steps in case of outsourced processes

In case of outsourced processes, no IFS processing steps shall be ticked for the auditor qualification and for the assessment duration calculation.

The scope of the Assessment shall include the full activities of the company, including all production lines and products manufactured by the production site.

When the assessed site has partly outsourced processes, and/or fully outsourced products, and/or traded products:

- They shall only be described and detailed in the applicable section of the IFS Assessment Report.
- On the certificate, under the assessment scope, only the relevant sentence(s) written in the standard shall be added (see part 1, chapter 2.2.1 of the IFS Food version 7 Standard).

DF7-1-2.2/7 V1

CLARIFICATION ON PART 1 – 2.2 SCOPE OF THE IFS FOOD ASSESSMENT

1.2.2.7 Clarification about logistics activities in case of fully outsourced products and/or traded products

Fully outsourced products and/or traded products are not covered by the IFS Food certification. To certify the fully outsourced products and/or traded products, a combined IFS Food/Broker Assessment shall be performed.

Assessment and reporting

The logistics activities of the fully outsourced and/or traded products shall be assessed in the combined assessment/audit. The situation shall be described in the company profile of the reports.

Deviations and/or non-conformities related only to logistics activities of fully out-sourced and/or traded products shall be raised in the IFS Broker report.

Certificate

Only in case a combined IFS Food/Broker assessment/audit is performed, the following sentences shall be written only:

- on the IFS Food Certificate: "The company has own broker/logistics activities which are IFS Broker/IFS Logistics certified".
- on the IFS Broker Certificate: "The company also has own processing activities, which are IFS Food certified".

Assessment duration

The CB shall decide based on a risk assessment, if a maximal reduction of 0,5 days can still be applied for a combined IFS Food/IFS Broker assessment/audit. It shall be indicated in the assessment duration details of the IFS Food and IFS Broker reports.

DF7-1-2.2/8 V1

CLARIFICATION ON PART 1 – 2.2 SCOPE OF THE IFS FOOD ASSESSMENT

1.2.2.8 Clarification about how to differentiate a raw material from food coming from partly outsourced processes

IFS defines a raw material in the glossary (annex 12 of the IFS Food Standard) as "a base material used for the manufacture of a product (ingredients, additives, packaging materials, rework)".

A raw material can be an already processed food or a non-processed food which is bought and processed (further) by the IFS certified production site.

A partly outsourced process is defined as a production step(s) or part(s) of the production process carried out off-site by a third-party on behalf of the IFS certified production site. In the IFS Standard, primary packaging and labelling are also considered as production steps: if carried out outsourced, these shall be considered as partly outsourced processes.

The ownership of the food which has partly outsourced processes belongs to the assessed site.

In case of a raw material, the ownership of the food does not belong to the assessed site, it is bought (already processed or not) from a supplier.

DF7-1-2.2/9 V1

CLARIFICATION ON PART 1 – 2.2 SCOPE OF THE IFS FOOD ASSESSMENT

1.2.2.9 Clarification about how to explain in the report special situations where same or similar raw material are bought than the food processed by the assessed production site

Example: A ready-to-eat salad contains toppings that are bought as raw material but the assessed production site also processes same or similar toppings.

In such a case, the situation shall be clearly explained in the report (company profile, additional information) and it shall be stated that the finished product contains toppings that are produced by the assessed production site as well as toppings that are purchased as raw material.

Note: In case the toppings are 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 on the certificate and description of the partly outsourced processes shall be given in the report.

CLARIFICATION ON PART 1 – 2.3.4 EXTENSION **ASSESSMENT**

PART 1 – 2.3 Type of IFS Food Assessments

Extension Assessment 1.2.3.4

1.2.3.4.1 If a company manufactures products at different periods over the course of the year, how can they ensure the products are covered by the IFS Food Certificate?

Example of a company processing two (2) kinds of products (A and B) in different periods of the year.

- During the main initial Assessment, the Assessment shall be focused on the processing activities of product A and on the documentation related to the processing of product A and B. After this Assessment, the certificate and the report should specify: "Production of product A—production of product B will be checked during an extension Assessment in month X"
- After the extension Assessment, the certificate shall be updated specifying "Production of products A and B". The report of the extension Assessment is to be uploaded to the IFS Database and shall only state the scope of the extension Assessment (please follow the help function in auditXpressX™ for extension Assessment).
- After the recertification Assessment, the certificate and the report should mention: "Production of products A and B" and an extension Assessment shall be performed at a later time to verify the processing activities of product B on site. Same annual procedure as above for the next recertification Assessments.

ALL CLARIFICATIONS >

DF7-1-2.3.4/1 V1

DF7-1-2.3.4/2 V1

CLARIFICATION ON PART 1 – 2.3.4 EXTENSION **ASSESSMENT**

1.2.3.4.2 In the case of seasonal processes, how should the Assessment process be managed?

In case of seasonal processes (e.g. wine making process), the main Assessment shall always be performed during the most hazardous processing step (e.g. wine bottling). It shall be guaranteed that all processes which have an impact on food safety are assessed, even if the processes are seasonal. If it is not possible for the auditor to assess the different processing steps when not operating at the same time, there are two (2) possibilities:

- No extension Assessment is to be performed to assess the manufacturing steps which could not be assessed during the main Assessment. The certificate shall only specify the processing step(s) which has/have been assessed (e.g. wine bottling).
- An extension Assessment is performed to assess the steps which could not be assessed during operation in the main Assessment and the certificate shall specify all the assessed steps of the process.

The key rule is that the certificate shall be clear and only specify what has been assessed.

DF7-1-2.3.4/3 V1

CLARIFICATION ON PART 1 – 2.3.4 EXTENSION ASSESSMENT

1.2.3.4.3 Processing of sparkling wine: when to perform the Assessment?

For the production of sparkling wine and champagne via bottle fermentation, there are two (2) sensitive processing steps:

- Tirage: operation of re-fermentation in which the bottle is opened again to add extra yeasts before re-closing the bottle after the first bottling step.
- Disgorging: operation after the re-fermentation in which the sediments are removed via the ejection of the previously frozen temporary cork.

Therefore both two (2) steps of tirage and disgorging shall be assessed on-site during an IFS Food Assessment.

When using tank fermentation procedures, at least the contents must be assessed.

DF7-1-2.4.2/1 V2

CLARIFICATION ON PART 1 – 2.4.2 UNANNOUNCED **ASSESSMENT OPTION**

PART 1 – 2.4 IFS Food Assessment options

Unannounced Assessment option 1.2.4.2

1.2.4.2.1 **Unannounced Assessment registration**

With the commencement of IFS Food version 7 Assessments, the unannounced Assessment registration known as option 2 will no longer be available. The already registered with option 2 but not yet performed unannounced Assessments will be switched automatically to initial Assessments.

For initial Assessments (also in case of seasonal production), the certificate validity is calculated from the last day of the Assessment date within the chosen time frame.

For recertification Assessments, the time window is calculated as follows [-16 weeks before Assessment due date; + two (2) weeks after Assessment due date]. The timeframe will be the same for all years.

An unannounced Assessment registration will be deactivated in the IFS Database if nothing has been uploaded within three (3) months of the last possible day of the Assessment 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 Assessment.

In case something is to be uploaded after this day, this can be done by IFS only and would come with associated costs. The certification body shall contact IFS customer support in such a case.

The certification body shall tick the box "Unannounced Assessment" in the IFS Database. When the Assessment has been performed, the certification body shall provide the Assessment dates in the database, at latest, 2 working days after the first Assessment day. This will ensure that the database users are informed that the Assessment has taken place and that the certification process is ongoing.

DF7-1-2.4.2/2 V2

CLARIFICATION ON PART 1 - 2.4.2 UNANNOUNCED **ASSESSMENT OPTION**

1.2.4.2.2 Can a CB perform an unannounced Assessment after a failed **Assessment?**

An unannounced Assessment can follow a failed Assessment in case:

- the site's customer requires an unannounced Assessment or,
- it is the third IFS Assessment and an unannounced Assessment is due.

DF7-1-2.4.2/3 V1

CLARIFICATION ON PART 1 - 2.4.2 UNANNOUNCED **ASSESSMENT OPTION**

1.2.4.2.3 When shall the on-site evaluation start in the case of an unannounced assessment?

In the case of an unannounced assessment, the opening meeting and the evaluation of the existing food safety and quality management system, which is achieved through the checking of documentation, should be kept short so the IFS Auditor(s) shall start the on-site evaluation as soon as possible.

DF7-1-3.1/1 V2

CLARIFICATION ON PART 1 – 3.1 ASSESSMENT DURATION

PART 1 – 3 IFS Food Assessment Realisation

1.3.1 **Assessment duration**

1.3.1.1 Are there exceptional situations where an Assessment time reduction can be accepted?

A maximal reduction of 0,5 days (4 hours) of the minimum Assessment time calculated via the calculation tool is accepted in the cases described below:

- a) IFS combined Assessments: e.g. combined IFS Food/IFS Logistics, IFS Broker/IFS Food under the condition that some parts are already assessed for one of the standards. In case of a triple combined assessment e.g. combined IFS Food/IFS Broker/ IFS Logistics, under the condition that some parts are already assessed for one of the standards, an additional reduction of 0,25 days (2 hours) is accepted (0,75 days possible reduction in total).
- b) Multi-location companies: in the case that requirements have already been assessed at the head office/central managing site.
- c) Multi-legal entity production site: in the case that the legal entities have different scopes at one physical location, a head office/central management can be appointed.
- d) For sites with labour-intense simple repetitive processes: a reduction is possible based on a risk assessment.

A maximal reduction of 0,75 days (6 hours) of the minimum Assessment time calculated via the calculation tool is accepted in the cases described below:

- a) For a site with Product-Scope 5 (fruit and vegetable), performing simple handling and no activity that significantly transforms the product from its original harvested form (according to GFSI scope BIII), only.
- b) For a site with Product Scope 3, 6, 8, 9, 10 and/or 11, that has simple processes such as:
 - sorting
 - bottling
 - simple packaging (e.g. no MAP or vacuum)
 - mixing/blending only in the case of Product Scope 10

DF7-1-3.1/1 V1

// 1.3.1.1 Are there exceptional situations where an Assessment time reduction can be accepted?

The reason for reduction needs to be selected in auditXpressX[™] and justified in the comment field with a short and comprehensive justification. This will show up automatically in the IFS Assessment report.

A combination of different reasons for reduction, including cross-standards, is not possible.

The IFS Integrity Program will regularly review these justifications for reduction.

Note for extension Assessment:

In case the Certification Body is aware that an extension Assessment needs to be performed every year, due to seasonal processes/products, the calculated assessment duration of the main assessment (including all Product-Scopes and Process-Steps) can be reduced by maximum 0,5 days (4 hours).

In case it is not possible to assess processes during an unannounced assessment that have been considered for the calculation of assessment duration, a reduction of maximum 0,5 days (4 hours) is possible.

This time needs to be included when calculating the duration of the extension assessment.

DF7-1-3.1/2 V1

CLARIFICATION ON PART 1 - 3.1 ASSESSMENT DURATION

1.3.1.2 Are there situations where less than 50% of the total Assessment duration can be allocated to the on-site evaluation?

In case a site has simple handling/processes as mentioned under 1.3.1.1 (10 hours Assessment duration after reduction), less than 50% but at least 1/3 of the total Assessment time shall be allocated to the on-site evaluation.

DF7-1-3.1/3 V1

CLARIFICATION ON PART 1 – 3.1 ASSESSMENT DURATION

Example of factors which may lead to an extension of the 1.3.1.3 minimum Assessment duration

Example of factors which may lead to an extension of the minimum Assessment duration are the following:

- initial Assessment the auditor may require additional time, for example, during opening and closing meetings
- number of production lines e.g. making a longer HACCP review
- complexity of the production process
- · size and age of the site
- communication difficulties, e.g. language
- quality of company preparation, e.g. documentation, HACCP
- number of non-conformities recorded in the previous Assessment
- difficulties during the Assessment that require further investigation
- · additional storage facilities, locations

DF7-1-3.1/4 V2

CLARIFICATION ON PART 1 – 3.1 ASSESSMENT DURATION

1.3.1.4 Are there documents available with examples and clarifications about the product scopes and processing steps?

A table with examples of products is available on the IFS website and will be updated when necessary.

This chart provides examples of products and their classification with respect to IFS Food version 7 product scopes.

In addition, a document called "Guidance on the allocation of IFS Food processing steps" is available on the IFS Website and gives explanations and clarifications about which processing steps could apply in different cases.

These two documents only provide a guide to understand the proper allocation of product scopes and processing steps and these lists do not claim to be exhaustive.

DF7-1-3.1/5 V1

CLARIFICATION ON PART 1 – 3.1 ASSESSMENT DURATION

1.3.1.5 What is the definition of "total number of employees"?

For instance, if the company normally has 300 employees (during most of the year), but the company has an additional 100 employees for one month, then these employees have to be included in the total number of employees when calculating the Assessment duration.

The company shall indicate the total number of employees over a year (in this case 400).

DF7-1-3.1/6 V1

CLARIFICATION ON PART 1 – 3.1 ASSESSMENT DURATION

Use of preservatives in food processes and selection of related P 1.3.1.6 steps to calculate Assessment duration and select appropriate auditor

In case any preservatives are used in a recipe – including dimethyl dicarbonate – it is not necessary to select processing step P4 to define Assessment scope, calculate Assessment duration and select appropriate approved auditor.

In the case of auditors approved for product scope 8 (beverages), specific attention should be paid during the Assessment to processes where dimethyl dicarbonate is used (e.g. validation and control of the process).

DF7-1-3.1/7 V1

CLARIFICATION ON PART 1 - 3.1 ASSESSMENT DURATION

How to calculate the Assessment duration for product scope 7? 1.3.1.7

In order to calculate the Assessment duration for product scope 7, the additional product scopes for processing the raw materials for product scope 7 apply. These additional product scopes do not apply for auditor scope approval and shall not appear on the certificate.

DF7-1-4.1/1 V1

CLARIFICATION ON PART 1 – 4.1 ACTION PLAN

PART 1 – 4 Post IFS Food Assessment actions

1.4.1 **Action plan**

Examples of acceptable evidence of the implementation of 1.4.1.1 corrections

Evidence of implementation shall be provided to the certification body within a maximum of four (4) weeks following the receipt of the provisional Assessment report and the provisional action plan for completion.

Examples of acceptable evidence of the implementation of corrections are as follows:

- Training records
- Updated procedures with traceable modifications: For a revised document, it may also be necessary to obtain evidence of training or communication related to the updated document for the company staff, in case other staff/another department has to work with it. For a revised form, it may be necessary to receive a completed form (e.g. for import-

ant tasks). However, this depends on the importance/frequency of use of the form.

- Before and after pictures
- Evidence (e.g. email) of communication of documents to the relevant personnel
- Internal audit or inspection report
- Invoices of repairs. Offers of repairs are not accepted, as it is only proof of the intention of correction, not evidence of correction

In each case, it is the responsibility of the CB to judge if the evidence can be accepted.

DF7-1-4.1/2 V1

CLARIFICATION ON PART 1 - 4.1 ACTION PLAN

1.4.1.2 Validation date of evidence for corrections and proposed corrective actions

The auditor or a representative of the certification body shall validate the evidence for corrections as well as the details of the proposed corrective action and the timeline. This validation date shall be written in the action plan in the last column "Release by the auditor".

ALL CLARIFICATIONS >

CLARIFICATION ON PART 2 - IFS ASSESSMENT CHECKLIST

PART 2 – List of IFS Food Assessment requirements

2.0 **General clarification**

2.0.1 What IFS expects when a requirement asks for an annual review?

When the requirement asks for an annual review, it is expected that this review takes place within 12 months. Whenever this 12 months' period is exceeded, this shall be justified to the certification body by the company and scored accordingly.

Requirements where an annual review is requested:

- Management review (1.4.1)
- Verification of the HACCP plan (2.2.3.10)
- Internal audit (5.1.2)
- Procedures for management of incidents and product withdrawal/recall test (5.9.3)
- Food fraud vulnerability assessment (4.20.4)
- Traceability system (4.18.2)
- Food defence assessment (6.2)

CLARIFICATION ON PART 2 - 1.2 CORPORATE STRUCTURE

PART 2 – 1.2 Corporate Structure

2.1.2.6 Clarification about which notifications and/or penalties need to be addressed to the CBs

- 1.2.6 The senior management shall ensure that the certification body is informed of any changes that may affect the company's ability to conform to the certification requirements. This shall include, at a minimum:
 - any legal entity name change
 - any production site location change.

For the following specific situations:

- any product recall
- any product recall and/or withdrawal by official order for food safety and/or food fraud reasons
- any visit from health authorities which results in notifications and/or penalties issued by authorities

the certification body shall be informed within three (3) working days.

Clarification about the sentence "any visit from health authorities which results in notifications and/or penalties issued by authorities".

In case of findings that are related to the IFS Food Standard scope e.g. for reasons of food safety and/or food fraud, the company shall communicate the notifications/penalties to the certification body.

CLARIFICATION ON PART 2 – 4.4 PURCHASING

PART 2 – 4.4 Purchasing

2.4.4.4–5 Supplier status and exceptional situations

- 4.4.4 The purchased raw materials, semi-finished products and packaging materials shall be checked in accordance with the existing specifications and justified by risk assessment for their authenticity. The schedule of these checks shall take into account, at a minimum, defined food safety and product quality risks. The frequency and/or scope of sampling shall be based on:
 - the impact of the raw materials, semi-finished products and packaging materials on the finished products
 - the supplier's status.
- The purchased services shall be checked in accordance with the existing specifi-4.4.5 cations. The schedule of these checks shall take into account, at a minimum:
 - the defined service requirements
 - the supplier's status (according to its assessment)
 - the impact of the service on the finished products.

In exceptional situations, where the supplier status is not available, the acceptance procedure for incoming purchased products or purchased services described in 4.4.4 and 4.4.5 shall adequately address the missing status by increased frequency and scope of product testing.

The exceptional situation shall be justified and documented.

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

CLARIFICATION ON PART 2 - 4.4 PURCHASING

PART 2 – 4.4 Purchasing

Clarifications about documented supplier audits 2.4.4.8

- The company shall approve the supplier of the outsourced processes through: 4.4.8
 - · certification against IFS Food or other GFSI recognised food safety certification standard or
 - documented supplier audit, performed by an experienced and competent person, which shall include, at a minimum, requirements for food safety, product quality, legality and authenticity.

IFS Food Global Market assessments at intermediate level are accepted as documented supplier audits.

The frequency of the documented supplier audit shall be justified by risk assessment, if not performed annually.

CLARIFICATION ON PART 2 - 4.15 TRANSPORT

PART 2 – 4.15 Transport

2.4.15.7 Companies working with parcel service providers

4.15.7 Where a company hires a third-party transport service provider, the service provider shall be certified for IFS Logistics or any other GFSI recognised certification standard covering the respective scope of activity. If not, all relevant requirements equivalent to the company's own transport practices shall be fulfilled and this shall be clearly defined in the respective contract.

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

CLARIFICATION ON PART 2 – 4.19 ALLERGEN RISK **MITIGATION**

PART 2 – 4.19 Allergen risk mitigation

Requirement clarification 2.4.19.3

According to this requirement, the company needs to follow the legislation for the declaration of the allergens in the finished products. For the adventitious or technically unavoidable presence, the labelling of legally declared allergens and traces shall be based on hazard analysis and assessment of associated risks. In the risk assessment of unintentional allergen entries, not only the risk from the declarable allergens processed in the company but also the unintentional allergen entry from raw materials shall be taken into account with regard to labelling of the end product.

CLARIFICATION ON PART 2 - 6 FOOD DEFENCE PLAN

PART 2 – 6 Food defence plan

Clarification about the (non) applicability of requirement 6.4 2.6.4

This requirement is not applicable if no food defence legislation exists in the country where the Assessment takes place which requires external food defence inspections and/or regulatory food defence visits, or if the company doesn't export to the US and no FDA food defence inspection is required.

As a result, food safety inspections which are performed by authorities are not involved in this requirement.

CLARIFICATION ON PART 3 – 3.1.1.2 GENERAL REQUIREMENTS FOR AUDITORS WHEN APPLYING FOR IFS EXAMINATIONS

PART 3 – Requirements for accreditation bodies, certification bodies and auditors

- 3.3.1.1 Requirements for IFS Auditors
- 3.3.1.1.2 General requirements for auditors when applying for IFS examinations
- 3.3.1.1.2.1 Which evidence should be provided, to be approved for languages other than the native language?

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

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

or

2 years work experience in the food sector in the respective country

or

At least 10 Assessments performed in the respective language of the country (trainee Assessments are not accepted) that includes writing reports in this language without an interpreter

or

• For initial approval only: successful completion of the oral or general written exam in the respective language without interpreter.

CLARIFICATION ON PART 3 - 3.1.1.2 GENERAL REQUIREMENTS FOR AUDITORS WHEN APPLYING FOR **IFS EXAMINATIONS**

3.3.1.1.2.2 IFS in-house conversion training for IFS Food version 7

For IFS Food version 7, the IFS in-house conversion training has been split into a one day CB in-house training and one day online modular course provided by IFS ("IFS Training on product/process approach"). This course is mandatory for all auditors, reviewers and trainers. The one day in-house conversion training shall cover at least the topics which are not marked as optional in the TTT training material.

This conversion training is additional to the yearly 2 day in-house training.

CLARIFICATION ON PART 3 - 3.1.1.3 IFS EXAMINATIONS **PROCESS**

3.3.1.1.3 IFS examinations process

3.3.1.1.3.1 Language of witness auditors during IFS witness audits

During a witness audit (any monitoring or sign-off audit), the witness auditor shall be approved for the language in which the auditor performs the Assessment.

CLARIFICATION ON PART 3 – 3.1.1.5 MAINTENANCE OF **AUDITOR APPROVAL**

3.3.1.1.5 Maintenance of auditor approval

3.3.1.1.5.1 Clarification on the maintenance of auditor approval in certain specific situations

Every year IFS Food Auditors shall perform a minimum of five (5) IFS Food Assessments as a lead or co-auditor.

This is applicable from the first full year following approval as an IFS Food Auditor.

In the following specific situations:

- In case the IFS Food Auditor is also a manager for IFS within the certification body
- In case the product scope(s) the auditor has is/are in a specific country where there is a lack of customers
- · In case it is in a specific emerging market

It is acceptable to perform at least 1 IFS Food Assessment and 4 audits according to GFSI recognised standards every year, nevertheless certification bodies shall do the utmost to perform as many IFS Food Assessments per Auditor as possible.

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

CLARIFICATION ON PART 3 - 3.1.1.8 FURTHER RULES AND **EXPLANATIONS CONCERNING THE NON-EXCLUSIVE APPROACH**

3.3.1.1.8 Further rules and explanations concerning the nonexclusive approach

3.3.1.1.8.1 Clarification about non-exclusive auditors and loan agreements

The loan agreements for individual Assessments and IFS Working Group Agreements remain generally unchanged, but loan agreements are not possible for non-exclusive auditors.

CLARIFICATION ON PART 3 - 3.1.1.9 GENERAL RULES **ABOUT ASSESSMENT TEAMS**

3.3.1.1.9 General rules about Assessment teams

3.3.1.1.9.1 Clarification about an auditor of an Assessment team applying for a scope extension

To be able to use the performed IFS Assessment as evidence when applying for an auditor scope extension in the case of an Assessment team, the auditors shall stay together during the whole IFS Assessment.

CLARIFICATION ON PART 3 – 3.2 OVERVIEW ABOUT REQUIREMENTS FOR INITIAL AND MAINTENANCE OF APPROVAL AND THE TASKS OF EACH IFS ROLE IN A CERTIFICATION BODY

- 3.3.2 Overview about requirements for initial and maintenance of approval and the tasks of each IFS role in a certification body
- 3.3.2.1 Clarification about specific types of Assessments 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 assessed (central management processes).

Extension Assessments are not acceptable for witness audits or auditor scope extensions.

CLARIFICATION ON PART 3 – 3.2 OVERVIEW ABOUT REQUIREMENTS FOR INITIAL AND MAINTENANCE OF APPROVAL AND THE TASKS OF EACH IFS ROLE IN A CERTIFICATION BODY

- 3.3.2 Overview about requirements for initial and maintenance of approval and the tasks of each IFS role in a certification body
- 3.3.2.2 IFS Witness Audit template to be completed by the certification bodies

With the introduction of IFS Food V7, it is mandatory to use the template for IFS Witness Audit reports for all witness audits (sign-off and monitoring witness audits). This also replaces the Witness Audit report template for IFS "Auditor in progress". It is available in the IFS CB login area. Certification bodies shall upload the IFS Witness Audit report to the IFS Database when adding a witness audit to the auditor portal.

This rule is applicable from the date of this Doctrine publication.

CLARIFICATION ON PART 4 – 1 INTRODUCTION

PART 4 – Reporting, auditXpressX™ software and **IFS Database**

Introduction 4.1

4.1.1 Clarification about the language of the report

In general, the language of the report shall be the working language of the company. In special cases defined by the certification bodies and agreed with the retailer(s) and different involved parties, the version of the report can be in English.

CLARIFICATION ON PART 4 – 2.1 IFS ASSESSMENT REPORT

PART 4 – Reporting, auditXpressX™ software and **IFS Database**

4.2.1 **IFS Assessment report**

4.2.1.1 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 Assessment, different COIDs, duplication of certificate and report.
 - The COIDs shall be mentioned in the Assessment overview of each Assessment report and linked in the IFS Database (visible for CBs only).
 - 2) multiple legal entities with different scopes at one physical location: different COIDs, different report and certificate.
 - The COIDs shall be mentioned in the Assessment overview of each Assessment report and linked in the IFS Database (visible for CBs only).
 - All Assessments shall be performed by one certification body.
 - The Assessment duration shall be calculated separately for each COID.
- In the case of multi-location production sites with or without head-office: different COIDs are created for each production site and linked in the IFS Database.
- If a CB creates by mistake a new COID for a company with an already existing COID, they shall contact IFS customer support. The new COID can either be deleted (if no documents have been uploaded) or both COIDs will be linked, so the assessment history is visible under the new COID. The old Assessments are visible and clearly connected to the old COID. The access rights to the report, the action plan and the Assessments comparison are transferred to the new COID.
- If the management of the company changes (new owner) but has the same employees, same equipment and the same processes: no change of COID, the CB shall perform a risk assessment and assess whether it is necessary to perform a "control-Assessment" to check that the current certificate is still ensured.

ALL CLARIFICATIONS >

// 4.2.1.1 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 Assessment shall be organised. The old Assessments are visible and clearly connected to the old COID. The access rights to the report, the action plan and the Assessments comparison are transferred to the new COID. Both COIDs will be linked in the IFS Database. The first Assessment performed at the new site is an initial Assessment. Therefore, the rule regarding 3 consecutive Assessments by the same auditor does not apply.
- 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 Assessments are not visible but the old COID is provided. The access rights to the report, the action plan and the Assessments 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 Assessment for the new legal entity) or if a new Assessment shall be done. The rule regarding 3 consecutive Assessments 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 food safety and quality management system deviation(s) and/or previous non-conformities.

Note 1: If a company maintains the same legal entity with the same employees, same equipment, same processes and just changes the legal form (example Jelly LTD to Jelly LLP) the COID shall not be changed.

Note 2: If a company maintains the same legal entity with the same employees, same broker services/processes and just changes the company name (example: Jelly sweet LTD to Jelly LTD) the COID shall not be changed.

Note 3: In each case where the COIDs are linked, a notification will be sent out to those who marked the company as favourite.

ALL CLARIFICATIONS >

CLARIFICATION ON PART 4 - 2.1 IFS ASSESSMENT REPORT

Which information of the report shall be translated in English? 4.2.1.2

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

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

CLARIFICATION ON PART 4 - 2.1 IFS ASSESSMENT REPORT

Is the GLN mandatory for companies in Switzerland? 4.2.1.3

Yes, the GLN is mandatory for companies in Switzerland as Switzerland is integrated into the European economic area through bilateral agreements with the EU.

CLARIFICATION ON PART 4 - 2.1 IFS ASSESSMENT REPORT

Reporting of unannounced Assessments 4.2.1.4

Information regarding whether the Assessment was unannounced shall be visible in the report. "Unannounced Assessment" shall be mentioned on the cover page and the Assessment overview of the report, as well as on the certificate.

CLARIFICATION ON PART 4 – 2.4 MINIMUM REQUIREMENTS FOR THE IFS CERTIFICATE

- Minimum requirements for the IFS Certificate 4.2.4
- **Erratum about one certificate requirement** 4.2.4.1
 - Assessment date(s) and time

CLARIFICATION ON PART 4 – 2.4 MINIMUM REQUIREMENTS FOR THE IFS CERTIFICATE

4.2.4.2 Clarification about head office/central management information on the certificate

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

CLARIFICATION ON PART 4 – 4 THE IFS DATABASE

The IFS Database 4.4

Form for extraordinary information to be filled out by the 4.4.1 certification bodies

After receiving the extraordinary information from the sites, certification bodies shall fill out in English the relevant form provided in the IFS Database. Certification bodies shall give a brief description of the identified cause and the related actions taken and shall decide on further actions and submit this information with the form as soon as possible. This rule is applicable from the date of this Doctrine publication.

Annex 1 Scope of application of the different IFS Standards and **IFS Program**

Annex 1.1 Clarification about the scope determination between IFS Food and IFS Logistics in regards to labelling

The IFS Food Standard is applicable in case of development and creation of the labels as the site has legal responsibility for it. In case of already created labels being adhered, the IFS Logistics Standard can be applied.

Annex 3 Product and technology scopes

Annex 3.1 When to apply the process step P2 and P11?

The process step 2 has to be chosen for any heat treatment (or high pressure) with the purpose to reduce a microbiological food safety hazard based on the company's HACCP plan (and not only in case of pasteurisation).

P-step 11 (cooking) shall be applied when the purpose of the process (based on HACCP plan) is a technical reason and not an action for hazard reduction (e.g. to change the consistency of a raw material or product such as cooking rice or potatoes to make them soft, cooking of pizza sauce for deep frozen pizza).

For Tech-Scope F there is an erratum:

Any other manipulation, treatment, processing not being listed in A, B, C, D, E and not contolled as a CCP or as a control measure.

Annex 10 IFS Assessment report: Main content

Annex 10.1 Clarifications on certain compulsory fields

To comply with the GFSI benchmarking requirements on animal conversion the following compulsory information shall be added in addition in the IFS Assessment report in case of an IFS Assessment at animal slaugtering sites:

In the already existing compulsory fields of the table, the following information shall be added for slaughtering sites only:

Plant layout and process flows 4.8.2

Only for animal slaughtering sites to fill in: Is an inspection plan in place at lairage and/or evisceration to ensure animals are fit for human consumption?

Process and work environment validation and control 5.3.1

Only for animal slaughtering sites to fill in: Are there defined post-slaughter time and temperature parameters in relation to the chilling or freezing of product?

For all KO requirements compulsory information shall be given in the IFS Assessment report. For KO n° 1, 1.2.1 and KO n° 3, 3.2.2, the IFS Auditor shall provide compulsory information as a free text in the IFS Assessment report.

For KO n° 10 5.11.2, the following information shall be given:

 Description of samples chosen during the Assessment for the follow-up of the corrective actions originating from internal audits, complaints, lab analysis etc. or any other source except the previous IFS Assessment.

For the compulsory field of the requirement 5.11.1 there is an erratum:

- · Date and version of the procedure.
- Description of the follow-up in the Assessment report overview and in the action plan.

Annex 12 Glossary

Annex 12.1 New definition about claims

Claim:

Any message or representation, including pictorial, graphic or symbolic representation, in any form (product label, packaging, advertisement, specifications, product inserts), which states, suggests or implies that the product has particular characteristic(s) or effect(s) that is/are not inherent to the product and/or is not generally present in similar products.

The following list of examples of the particular characteristic(s) and/or effects does not claim to be exhaustive:

- nature or composition (e.g. organic, "natural", "free from", "source of", "reduced", etc.),
- standards of identity for products (e.g. meat products, specific labels, etc.),
- origin or provenance (e.g. "made in ...", "product of ...", PDO/PGI, etc.),
- methods of production/processing (e.g. fairtrade, religious claims, etc.),
- specific properties, structure and/or function related to a risk reduction for customers and/or consumers (e.g. related to prevent or reduce the risk of health diseases, prevent the contamination by spoilage or pathogen microorganisms, etc.)
- specific properties, benefits and/or effects for customers and/or consumers due
 to the usage of the product (e.g. anti-aging effect in cosmetics, extend shelf life of
 food in packaging, improving or modifying a physiological function or biological
 activity associated with health in food, etc.)

Claims linked to the product can be declared only if:

- Evidential support is available to demonstrate their truthfulness, honesty, fairness and legal compliance.
- Are approved to be used by the relevant authority, when applicable.
- Clear and understandable information is provided to the users (customer, consumer and/or end-user, as applicable) about the particular characteristic(s) and/or effect(s) declared in regard to the intended use of the product.

Note: in case of IFS Assessments, claims shall not be used in the description of the Assessment scope on the IFS Certificate, in order to avoid confusion on the scope of the IFS Assessment and certification.

Annex 12 Glossary

Annex 12.2 Clarification about the primary packaging material definition

In the definition of primary packaging material, "consumer unit" refers to the smallest consumer unit of the product that includes legal information and a bar code, if applicable.

For example:

- A frozen pizza packaged with a foil and then with a carton box: in this case, the foil
 and the box are considered as primary packaging material, because the foil is in
 direct contact with the product, and the box bears all the legal and relevant food
 safety information on it.
- A pack of water bottles grouped with shrink wrap: if each bottle has all relevant information on its label, then the primary packaging material is the labelled bottle unit. The shrink wrap is considered as secondary packaging material.
- A pack of milk puddings grouped with a cardboard sleeve: if the cardboard sleeve
 has any legal information which is not marked on the product itself (e.g. bar code),
 and/or if it can transfer their constituents to the food, then the cardboard sleeve
 is part of the consumer unit.

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