

POSITION STATEMENT – AUDITOR COMPETENCE

Date: 19 July 2022

The application of specific requirements as set out in this position paper has been approved by the Management Board of the Foundation FSSC and provides clarification or overrules the current requirement in the HPC 420 Scheme – effective as of 15 July 2022.

INTRODUCTION

This document provides information on the application of specific requirements for HPC 420 auditor competence, as laid out in the Scheme, Part 2, Section 4.1. For the full set of requirements, please refer to Part 2 of the Scheme.

1. Work experience of auditors (*The Scheme, Part 2, Section 4.1.1*):

The requirements as laid out in the Scheme are as follows:

- a) All auditors have at least 2 years' working experience in the industry in a research, process/product development, quality assurance, lab control, risk assessment, or management training job where chemistry is applied at a professional level. Consultants in these sectors can comply by showing a log of work experience of 2 years' time equivalence (+/- 400 days) in the sectors **and/or**
- b) Work experience as a registered ISO 9001 lead auditor with 2 years audit records of companies producing chemical product(s). Sector knowledge of the category the auditor will be working in, may be linked to performed audits in category A, B and C **and/or**
- c) Work experience as a registered ISO 22000/FSSC 22000 lead auditor category K (Bio Chemicals) with 2 years of audit records.

In addition to the above-mentioned requirements in the Scheme, the Foundation has confirmed that the following work experience is also acceptable for Category A, B, and C:

- d) The work experience as a registered lead auditor for IFS HPC Standard for products/processes of suppliers manufacturing household and personal care and BRCGS Global Standard Consumer Products (Personal Care and Household) with 2 years audit records.
- e) A combination of the above (a-d) e.g., 1 year work experience in industry and 1 year work experience as a registered lead auditor in b), c) and/or d).

Note this is NOT applicable for category D (packaging).

2. Auditor Training (The Scheme, Part 2, Section 4.1.3):

The Foundation has confirmed the following interpretation of the specific requirements on the mandatory training program as set out below:

- Current requirement: Contracted CBs shall assure that all their registered Scheme auditors are trained for the Scheme categories they are qualified for and that the CB training programs contain the required subjects (See Appendix II B3) at an adequate level. (Able to understand and verify the organization's compliance with this standard).

*New: Contracted CBs shall ensure that the Auditor training programs include the **main subjects** as set out in Appendix II B3 to the level appropriate for the Scheme category. The objective of the training program is for auditors to understand and be able to verify the organization's compliance with the Standard.*

- Current Requirement: For new auditors, supervised training in the assessments of the Scheme's safety and quality management systems, HACCP skills, CCPs, PRPs, and applied Product Safety Risk Management system principles (PAS 420 Chapter 8), specific audit techniques, and specific category knowledge shall include successful completion of the Scheme through 5 audits or 10 audit days at a number of different organizations. Combination audits of ISO 22716 with ISO 9001 count as well. In this case, the auditor has to conduct both audits where ISO 22716 and ISO 9001 are combined.

New: general interpretation of the above requirement, in respect of the acceptable certification audits, is as follows:

- *Audits: A minimum of ten (10) audit days consisting of at least five (5) third-party certification product safety audits that cover elements of safety and quality management systems, HACCP, and Product Safety Risk Management in the relevant industry section. This includes the following third-party certification product safety audits:*

- HPC 420 audits*
- FSSC 22000 audits in category K*
- ISO 22000 audits in category K*
- IFS HPC Standard for auditing products/processes of suppliers manufacturing household and personal care*
- BRCGS Global Standard Consumer Products Personal care and household*
- Combined ISO 22716 & ISO 9001 audits*

- *For new auditors who have not previously audited to any of the above-mentioned third-party certification product safety audits, then of the five (5) audits, it shall include at least one (1) HPC 420 audit under the supervision of an HPC 420 qualified auditor or a CB HPC 420 technical certification person of equivalent competence and experience.*

- *For auditors who have previously audited as lead auditors for any of the above-mentioned third-party certification product safety audits, there is no requirement for one (1) of the five (5) audits to be under the supervision of an HPC 420 qualified auditor.*

- **Current Requirement:** A documented sign-off of the satisfactory completion of the training program by the appointed supervisor.

New: The interpretation of the above requirement, is as follows:

- *The CB shall ensure as part of the documented sign-off process of the satisfactory completion of the training program, that an HPC 420 witnessed audit is conducted to confirm the competence of the auditor.*
- *Witnessor: The witness audit shall be undertaken by an auditor qualified for HPC420 or a third-party certification product safety scheme (refer i-vi above), who can demonstrate competence in the HPC 420 Scheme requirements, or by a CB HPC 420 technical certification person of equivalent competence and experience. Witnessors shall be assessed and qualified by the CB as suitable to undertake witnessed audits.*
- *At least one (1) HPC 420 witnessed audit shall be conducted every three (3) years to confirm acceptable auditor performance. This shall take place as part of the 3-yearly requalification process.*
- *Remote witnessing:*
 - Where appropriate ICT tools are available, this technology may be utilized for the remote witnessing of existing household and personal care auditors, of any of the above third-party certification product safety audit schemes. Remote witnessing is not allowed for new auditors who have not previously audited for any of the above-mentioned third-party certification product safety audit schemes.*
 - In all cases where remote ICT tools are used, the CB needs to ensure that the technology is appropriate and enables the witnessor to observe the full HPC 420 certification audit, including the opening meeting, document review, on-site facility audit and the closing meeting. It needs to be clearly reflected in the witness audit report that the witness was conducted remotely, and which remote technology was used.*
 - Permission will be required from the (certified) organization to conduct the witness audit in this manner and the normal confidentiality requirements apply. The technology needs to be tested beforehand and both the witnessor and the auditor trained in the use of the technology as required in IAF MD4. In all instances where the technology utilized is not functioning properly or preventing/hampering a robust audit, the witness audit shall be aborted, and suitable follow-up actions determined by the CB.*

The following exemption may be requested for the first auditor of a CB being qualified to the HPC 420 Scheme:

- *A witness audit of an IFS HPC Standard for products/processes of suppliers manufacturing household and personal care and BRCGS Global Standard Consumer Products Personal care and household, completed within the past two (2) years, may replace the first initial witness audit if all other requirements are being met.*

The CB shall submit an exemption request to the Foundation for pre-approval in these cases.