

**Communication to EFISC certified companies- Quality and feed safety managers and Certification bodies**

**Date: 8 January 2015**

**EFISC- Code version 3.1 of the European feed safety management system- implementation as of 15 February 2015**

**Over the last year the EFISC feed safety management has been revised based on the evaluation process with the European Commission and the Member States, as well as our agreement with QS and OVOCOM to develop a module for unannounced audit. Therefore EFISC Aisbl is pleased to publish the new version of the EFISC Code version 3.1 and the Rules of Certification version 3.1.**

This step forward provides further improvement of the EFISC feed safety management certification system and a solid basis to further strengthen the confidence in EFISC certification. The EFISC version 3.1 will be applicable as of the 15 February 2015.

**What does the revision of the requirements means for the operator?**

There are a few changes in the **Rules of certification**. The main changes are the inclusion of the unannounced audit programme (§7.1 Rules of certification). Operators delivering feed materials to OVOCOM or QS certified operators have to register for the mandatory unannounced audit as a pre-condition for delivery with the certification body (one unannounced audit in the three years). All other operators participate in the random unannounced audit programme (5 % of the operators will be audited unannounced annually). The participation of the operator will be registered in the EFISC certification database (option (1) random of (2) mandatory). Furthermore a modification has been made to the determination of the audit time as well as the audit reporting.

In the **Code** the scope has been modified in order to include the storage and transshipment of feed materials (for the operators production facility/ operators head-office own account). The requirements for storage and transshipment are formulated in §4.3.10.1

Please see the Annex for the full list of the changes made.

**Webinar**

May I invite you to a live webinar on the revised version of the EFISC Code and Certification requirements on the 20 January, 14.00- 15.00 hrs? The webinar will be given in English. Please let me know if the date does not work for you and we fix another day and time.

Please register for the webinar by sending an email to [peter.brattinga@efisc.eu](mailto:peter.brattinga@efisc.eu) and you will receive an invitation email with the login information.

In case you have questions please do not hesitate to contact me.

Best regards,

Peter Brattinga  
EFISC Manager

## The main changes in a nut shell

### Changes to the Rules of Certification version 3.1

	§	Page	Changes made
1	1.1	5	Replace AAF by Starch Europe (everywhere in text)
2	1.1	5	Delete EFIP reference (everywhere in text)
3	7.1	21	Combined audit with ISO 22000, FSSC 22000, BRC, IFS. From 30 to 50 % time reduction. Deleted the text on the combined audit reporting (unnecessary, created confusion)
4	7.1	21	<p>Under auditing added the requirements for the unannounced audit</p> <p><b>b) Unannounced audit programme</b></p> <p>The EFISC unannounced audit will take place in addition to the annual announced audit in the three year certification cycle as described in ISO 17021 and this document.</p> <p>All EFISC certified operators will participate in the unannounced audit programme. However there are two options.</p> <p><b>a) Random (R) unannounced audit programme</b></p> <p>The Certification Body will randomly select around 5 % of the certified operator(s) annually and implement the necessary unannounced audits (5% in addition to operators participating in the mandatory unannounced audit programme).</p> <p><b>b) Mandatory (M) unannounced audit programme for suppliers to QS and OVOCOM certified customers</b></p> <p>QS and OVOCOM require feed material producers to have one unannounced audit in the three years as a pre-condition in order to be eligible to deliver into the scheme. The EFISC certified operator delivering into the QS and OVOCOM scheme will arrange as such with the certification body. The certification body will inform EFISC on the participation of the operator in the mandatory unannounced audit programme.</p> <p>The participation of the operator in the in the unannounced audit programme will be indicated in the EFISC certification database (R or M).</p> <p>The unannounced audit will take place in the period two months after and before the annual audit. The audit will focus on GMP and GHP practices. The unannounced audit will take place during normal working hours.</p> <p>The unannounced audit time is minimum 4 hours, including reporting time (The reporting time is max. 25% of the time).</p> <p>The operator will be informed by the certification body two working days in advance in order to organise entrance and guidance through the facility. The starting time will be agreed on. The CB will provide the personal information on the auditor arriving for the audit to the operator. In a situation where more traveling time is required and/or visa applications, the two days can be extended to the minimum workable time.</p> <p>The operator can indicate up to 15 days in the year that the audit cannot take place. The days should be used when the site is not in production because of planned maintenance.</p>

			<p>The operator may in principle not refuse the unannounced audit. In case of refusal the operator will provide a valid motivation.</p> <p>The outcome of the unannounced audit will be handled in accordance with the requirements described in Section 7 and especially §7.1.10 Follow-up of nonconformities and their closure.</p> <p>The EFISC unannounced audit (random or mandatory) will be covered in the contractual arrangement between the operator and the Certification Body. The cost for the unannounced audit and possible follow-up in case of nonconformities will be paid by the operator.</p> <p>The participation of the operator in the unannounced audit programme (R or M) will be indicated on the public EFISC database for certified operators.</p> <p>The effectiveness of the unannounced audit programme will be evaluated annually.</p>
5	7.1.3	24	Determination of audit time. Modified the text on reporting. The requirements for the audit time calculation are given in the ISO/TS 22003. This is not the case for the reporting. Modified the text to bring some flexibility to the reporting time.
6	7.1.4	26	Table minimum audit times- column 1 text modified- Main office and production site Column 6- Increased the time reduction from 30 to 50 %
7	7.1.5	28	Included unannounced audit in the table

#### Changes to the EFISC Code 3.1 –Alignment with the revised Guide- important point on scope – transshipment

	§	Page	
1		2	Inclusion of EBB
2	1	4	Updated text stakeholder “This Code has been developed in consultation with the related European sector organisations, the compound feed manufacturers association FEFAC and other stakeholders (See Appendix 1 for more details). The revised “Guide” version of this document is endorsed by the European Commission- Standing Committee for Plants, Animals, Food and Feed.”
3	1	4	<p>Included ISO 9001- This Code was also developed in line with most of the management precepts laid down in ISO 9001:2008 and ISO 22000:2005.</p> <p>Added ref. to EA- The EFISC feed safety certification system has been evaluated and approved by the European Accreditation Body (EA).</p>
4	2.1	8	<p>Included transshipment in the scope- This Code covers the industrial manufacturing of feed materials starting from the entry point of incoming materials, including the purchasing of raw materials related to feed material manufacturing, plant storage, manufacturing, sales and transport of the product produced, until the point of transfer of ownership.</p> <p>In addition the scope includes the storage and transshipment of feed materials (for the operators production facility/ operators head-office own account).</p>

5	2.6.2	13	Added CIP under definitions- <b>Cleaning in place (CIP):</b> cleaning of equipment in its assembled condition and at its location
6	4.2.3.2	20	Added aspiration under ventilation- a) <b>Ventilation and aspiration</b> Ventilation of sufficient capacity shall be provided to keep rooms free of excessive steam, condensation and dust.
7	4.2.4	22	Added dosage equipment <b>4.2.4 Control of monitoring, measuring and dosing devices</b>  The management shall ensure that monitoring and measurement can be carried out in a manner consistent with documented procedures. Where necessary to ensure valid results, measuring and dosage equipment shall:
8	4.3.10.1	29	<b>NEW SECTION- covering the requirement for transshipment- modification of the scope.</b>  <b>4.3.10.1 Storage and transshipment</b>  The operator must control all storage and transshipments of feed materials (packed and bulk) in order to assure a safe feed material. The process will be defined, controlled and documented, in line with the requirements for storage and transport in this Code. This applies for storage and transshipment at the own location. The transshipment of feed materials will be covered by the operators risk assessment. The risk assessment will address the risk of contamination and following, the appropriate cleaning regime.
9	4.4.3.3	37	Laboratory and methods- added "and methods" to the ISO 17025 requirement.
10	6.7	47 HACCP- risk assessment	The relevant sector document provides information by hazard/ product/ process regarding the risk classification and possible control measures. The risk level indicated in the sector documents is without control measures in place. Control measures taken at previous steps in the food chain as well as measures taken in the pre- requisite programme can move the level of the risk (likelihood) to the left in the risk matrix- See table A.  The table is based on two basic elements for risk characterisation, i.e. severity and likelihood. Where appropriate, additional parameters such as the detect ability may be included in order to allow a specific adaptation of the risk assessment on a case by case basis.  Modified tables for the risk matrix and risk evaluation
11	6.8	50 Selection of control measures	Additional text from ISO 22004 on the control measures  The hazard analysis may determine that control of a hazard by the organization will not be needed. This may occur when, for example, the introduction or occurrence of an identified food safety hazard meets the defined acceptable level without any further intervention by the organization. This may, for instance, be the case where adequate controls

			<p>have been implemented at other stages in the food chain and/or where introduction or occurrence within the organization is unlikely or so low that the acceptable level will be met anyway (ISO/TS 22004: 2005).</p>
	6.11	51	<p>Introduction of performance standard for the OPRP For the OPRP's the performance standard will be defined.</p>
	Annex 1	58	<p>Deleted EFIP from the text. Reference to EC and EA, replaced AAF by starch Europe</p> <p><b>APPENDIX 1: Stakeholder consultation</b></p> <p>EFISC has contacted and met a large representation of industrial sectors linked with production and consumption of feed materials, national certification schemes, certification bodies, European Commission DG Health and Consumer Protection, European Accreditation Body and other stakeholders throughout the Community.</p> <p>The aim of these meetings was to invite all major stakeholders associated with the feed industry in the EU to provide feedback on this Code prior and after to its first release in June 2009 and the following revisions.</p> <p>The final objectives of this consultative process, which is still open and continuous, are:</p> <ul style="list-style-type: none"> <li>a) Search for contributions, establish a constructive discussion and invite stakeholders to provide comments and proposals on the text for its continuous improvement.</li> <li>b) To provide a good understanding of the Code approach to other sectors.</li> <li>c) To reach a sufficient degree of confidence within the feed and food chain, taking the greatest care of the legitimate safety expectations of the other sectors industry.</li> <li>d) To provide the Code a chain approach and coordination with the other parties involved.</li> </ul> <p>A special mention has to be given to the very active participation of Starch Europe and FEDIOL within the EFISC of which they are founding members. Together, the EFISC members represent the vast majority of all "processed feed materials" that enter the food chain via compound feed.</p>