

Provision for Implementing an Unannounced Audit According to the JFS-C Certification Scheme Document

1. Objectives of an unannounced audit

Certified organizations shall accept an audit without prior notice (hereinafter referred to as “unannounced audit”) according to 4.3.2 1) (5) of the JFS-C Certification Scheme Document, version 2.3. An unannounced audit is intended to objectively prove that an organization is constantly performing its food safety management that satisfies the requirements of the JFS-C standard, and the audit is an effective means for organizations to discover potential food safety risks in their daily operations.

This Provision specifies the items required for certification bodies and organizations to implement and accept an unannounced audit. Certification bodies and organizations shall comply with the requirements specified herein.

2. Scope

Organizations have a duty to accept an unannounced audit according to 4.3.2 1) (5) of the JFS-C Certification Scheme Document, version 2.3. The organization shall bear any costs incurred during the unannounced audit (including those incurred when an organization rejects the unannounced audit and those for an additional audit as specified in 6 (5)).

Certification bodies that have concluded a contract with the Association based on the JFS-C Certification Scheme Document, version 2.2 or later, shall implement the unannounced audit¹.

3. Determination of an unannounced audit date

- (1) The certification body shall implement at least one of the surveillance audits scheduled during a certification cycle (three years) from the initial audit or a recertification audit to the next recertification audit as an unannounced audit on any day excluding the exclusion dates for unannounced audits (so-called “blackout days” (BODs)). However, an unannounced audit shall not be implemented on the initial audit, recertification audits and transition audits.
- (2) The certification body shall check with the organization the exclusion dates for an unannounced audit during a period of three months or longer. The organization shall notify the certification body of BODs within two weeks after receiving a confirmation inquiry from them. BODs shall be limited to days on which the organization does not perform regular operations due to rational

¹ An unannounced audit has been specified in the JFS-C Certification Scheme Document, version 2.2 and later. Although application of the Document is voluntary until October 4, 2018, it will be obligatory from October 5, 2018 (JFSM_2017_C01N03). In addition, certification bodies shall accept a transition assessment for version 2.3 during an accreditation assessment to be implemented on October 5, 2018 or later (JFSM_2018_C01N01).

reasons (including days on which they perform some operations, but do not perform the operation to be audited).

- (3) When a new BOD is discovered after BODs have been determined based on the agreement between the certification body and the organization, or when the day is not applicable to a BOD, but has a due cause for inoperability of an unannounced audit, the organization shall notify the certification body of it and have a discussion with the certification body so that an unannounced audit can be properly implemented.

4. Planning of an unannounced audit

- (1) The certification body shall determine the man-hours for the audit based on Annex 2 of the JFS-C Certification Scheme Document, using the same method as for the regular surveillance audits.
- (2) The certification body shall not notify the organization of the audit plan beforehand.
- (3) The audit team shall implement an unannounced audit within the operating hours (including night shifts) at each site of the organization.

5. Competency of auditors

- (1) The certification body shall provide the auditors who implement unannounced audits with the required training attributed to being unannounced.
- (2) Considering that the organization cannot confirm the audit team members in advance, the certification body shall select auditors who have no stake in the relevant organization as members of the audit team even more carefully than regular operations to ensure impartiality of the audit team. In addition, it is recommended that the certification body select the audit team leader from auditors who have experience with auditing the relevant organization.

6. Implementation of unannounced audit

- (1) After arriving at the site and completing the procedures at reception, the audit team shall hold the minimum amount of opening meeting, enter the production site within an hour, and immediately start the audit of the production site.

The unannounced audit shall focus on the checks to see if food safety management is implemented appropriately at the production site.

- (2) The audit team leader can postpone the unannounced audit after discussion with the management representative who is in charge of certification activities of the certification body if the unannounced audit is rejected by the organization for any of the following reasons:
 - 1) When operations are stopped because of an earthquake, typhoon, tsunami, or other natural disasters, ~~such as~~ fire, strike, or insurrection.

- 2) When the certification body determines that there is another due cause that makes implementation of an unannounced audit impossible (including cases in which such a determination is made through an on-site inspection by a government or second-party audit).
- (3) If the organization rejects an unannounced audit for any reason other than those specified in (2) above, the certification body shall suspend certification of that organization.
- (4) Within six months after the suspension specified in (3) above, the certification body shall implement an unannounced audit. If the organization rejects the unannounced audit again, the certification shall be withdrawn.
- (5) The audit team shall, in principle, audit all the requirements on-site on the day of the unannounced audit. Only when an audit unavoidably cannot be implemented for any requirement regarding the activities of top management, human resources division, procurement division, R&D division, and other parties/divisions that have no direct relationships with the production lines because of the absence of a person in charge of the activity, the audit can be implemented as an additional audit, including off-site on a later day. This additional audit can be implemented with prior notification to the organization if it is required to implement the audit appropriately.
- (6) The certification body shall comply with 4.3.2 and 4.3.3 in the JFS-C Certification Scheme Document version 2.3 unless otherwise specified in these provisions.

End.