

	CERTIFICATION INSTRUCTION	D-CI-01.01
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ISSUED BY	Emmanouil Geneiatakis, FAMI-QS Secretary General Date of issue: 2020-12-11
TYPE OF INSTRUCTION	<input checked="" type="checkbox"/> Immediate Implementation <input type="checkbox"/> Information <input type="checkbox"/> Interpretation <input type="checkbox"/> FAMI-QS Awareness
APPLICABLE FOR	<input checked="" type="checkbox"/> Certification Bodies <input checked="" type="checkbox"/> Feed Business Operators <input checked="" type="checkbox"/> Accreditation Bodies <input type="checkbox"/> Authorised Training Organisations Starting date:
SUBJECT	Audit against the FAMI-QS Feed Fraud Prevention and Defence Module
PURPOSE	To define and harmonise the audit process against the FAMI-QS Feed Fraud Prevention and Defence Module
Certification Instruction	<p>In 2018, FAMI-QS carried out the challenging task to incorporate the requirements for Feed Fraud Prevention and Defence under its third-party certification system by creating an additional mandatory add-on module for the FAMI-QS Certification System Version 6.</p> <p>With the incorporation of the FAMI-QS Feed Fraud Prevention and Defence requirements, FAMI-QS will be first scheme to have officially Fraud and Defence as an object of conformity and not just as a requirement. As an object of conformity, feed fraud will be shown on the certificate.</p> <p>Scope</p> <p>The Feed Fraud Prevention and Defence module requires operators seeking certification to FAMI-QS to apply the scope as defined for the FAMI-QS 6.0 certification. The certification body should place particular focus on the specific requirements on defining the scope for feed fraud prevention and defence as defined in sections 6.1.2. and 7.1.2 of the Feed Fraud Prevention and Defence module. Due to the nature of the topic, the FAMI-QS Certified Organisation shall review the suitability of their current assessment on an annual basis in the framework of their actions for continuous improvement. The annual review does not mean that an update of assessments is required.</p> <p>Audit Duration</p> <p>For the initial assessment of the implementation of the FAMI-QS Feed Fraud Prevention and Defence module, the certification body shall allocate (as a minimum) 0.5 man-days as an add-on to the auditing time that has been already allocated.</p>

Certification bodies should carefully plan the calculation of audit time. Specific conditions such as geography, location dimensions (e.g., size of the facility) that require additional audit efforts in relation to the FAMI-QS Feed Fraud Prevention and Defence module can lead to additional audit time being allocated.

Such should also include consideration on additional audit time for a multi-site certification based on the activities of the organisation.

For the next subsequent audit, the certification body shall allocate an appropriate time based on their experience with the FAMI-QS Certified Organisation, for the review of the vulnerability and threat assessments.

Resource Requirements

The certification body should ensure sufficient and competent personnel for managing and supporting the provision of the feed fraud prevention and defence audit activities according to the FAMI-QS Rules for Certification Bodies current version, including an update of the competence criteria.

In addition, the certification body shall ensure that the competent personnel:

- 1) have successfully completed an internal training course on feed fraud prevention and defence provided by the certification body (subject to FAMI-QS' approval) or by FAMI-QS.
- 2) are trained on all aspects of the audit guidance.

Sufficient documentation of training activities shall be kept.

Once the certification body is ready to provide the audits against the FAMI-QS Feed Fraud Prevention and Defence module, they have to notify the FAMI-QS Secretariat via email to Mrs Sofia Poucha audit@fami-qs.org.

Following the receipt of your notice, the checklist for your organisation in ViaSyst platform will be unlocked.

Audit planning

The certification body assesses the feed safety management system of the organisation in compliance with the FAMI-QS Code Version 6.0 and therefore the Feed Fraud Prevention and Defence module, based on initial, surveillance and recertification audits. The audit programme shall be adapted accordingly to include the audit against the requirements of the FAMI-QS Feed Fraud Prevention and Defence module. The module will be audited through a desk review and a (remote or onsite) audit. For initial certification, this shall be part of the Stage 1 audit.

Multisite organisations¹: certain aspects relating to fraud and defence shall be checked on the local sites. These local sites may not have a complete vulnerability and threat assessment, and therefore only specific (fraud) vulnerabilities relating to the local operation will be assessed, given that all other aspects are managed centrally.

Confidentiality considerations, documentation of the remote audit process deployed and any documents supporting the assessment findings shall be maintained. Special attention shall be given to the feed defence assessments for which permission may be required.

In case of an initial certification audit to FAMI-QS Code 6.0, all rules for conducting Stage 1 and 2 audits as defined in the latest version of the Rules for Certification Bodies apply.

Maintaining certification

Certification bodies shall integrate the audit activities required for the Feed Fraud Prevention and Defence module in all audit activities relating to maintaining certification, including surveillance and re-certification.

Special and unannounced audits, as defined in the latest version of the Rules for Operators, shall not include audit activities for the Feed Fraud Prevention and Defence module.

Classification of non-conformities and recommendations

Certification bodies shall classify any non-conformities and recommendations on the Feed Fraud Prevention and Defence requirements according to the definitions of non-conformities and recommendations defined in the latest version of the Rules for Operators.

Assessment of suppliers and assured sources

Certification bodies shall assess the Feed Fraud Prevention and Defence requirements for suppliers and assured sources according to the audit guidelines for suppliers and assured sources, as defined in the latest version of the Rules for Operators. Please note that all the current mutual recognitions and accepted standards are for feed and food safety and they do not include the aspect of fraud.

¹ An organization covered by a single management system comprising an identified central function (not necessarily the headquarters of the organization) at which certain processes/activities are planned and controlled, and a number of sites (permanent, temporary or virtual) at which such processes/activities are fully or partially carried out. (IAF MD1:2018). The Certification Body shall maintain a single audit programme and audit plan. Please note that we refer to multi-site application where site sampling is not possible.

Certificate

Once the certification body confirms that the requirements of the module are fulfilled, the certification body shall re-issue the certificate with the highlighted statement for the remaining validity period of the certificate (if the update occurs at the time of surveillance or in between). An update of the certificate (selection of the checkbox 'Fraud and Defence') is also required in the ViaSyst platform.

Operator's Name
has implemented and maintains a Feed Safety and Quality Management System including Good Manufacturing Practice (GMP) in compliance with:
FAMI-QS Code (Version x, YYYY-MM-DD)

on the following site(s)(1) XXX

FAMI-QS Site Registration: FAM-xxxx/xx

for Activity(2) of Specialty Feed Ingredients
From Process (3)

Feed Chain Category(4) DI, K, FI, FII

The Operator implements measures for feed fraud/feed defence according to the FAMI-QS Feed Fraud Prevention and Defence Module Version 1.

This certificate is valid until: YYYY-MM-DD

Other

All other principles of transparency, surveillance, sanctions, notification of changes and the use of logo also apply to the audit activities against the Feed Fraud Prevention and Defence module.