



## **NABCB Guidance for Transition to ISO 22000:2018**

### **1. Background information**

The revised **ISO 22000 Food safety management systems – Requirements**, has been published by the International Organization for Standardization (ISO) under the ISO Technical Committee TC 34 (SC 17/WG 8) in **June, 2018**.

The major changes to the new version include modifications to its structure and also clarify key concepts as detailed below:

- Firstly, the new High Level Structure (HLS) developed by ISO, which is mandatory when drafting or revising management system standards, had to be incorporated into the standard. The HLS sets a framework for the management system standards, which makes it very easy for businesses to conform to more than one management system standard.
- Secondly, WG 8 decided to provide the users of ISO 22000 with a new understanding of the different approaches to the notion RISK. As a concept, risk is used in various ways and it is very important for food businesses to distinguish between the well-known hazard assessment on the operational level (HACCP), and the concept of business risk where opportunities also form part of the concept.
- Thirdly, WG 8 also decided to further clarify how the Plan-Do-Check- Act (PDCA) circle works by having two separate circles in the standard. The two PDCA circles will operate one inside the other; one covering the management system and the other, within it, the operations described in Clause 8, which simultaneously cover the principles of HACCP defined by Codex.
- Finally, the users of the current standard have asked for a clear description of the differences between CCPs, OPRPs and PRPs, while maintaining alignment with Codex definitions as much as possible

### **2. IAF Policy**

#### **2.1 Transition Period**

IAF Resolution 20137-16 was passed by the IAF General Assembly in Vancouver in October 2017 endorsing a **3-year transition period to ISO 22000:2018** from its publication date. During this period both ISO 22000:2005 and the revised version ISO 22000:2018 will co-exist

#### **2.2 Validity of certifications to ISO 22000:2005**

- 2.2.1 ISO 22000:2005 certifications will not be valid after three years from the date of publication of ISO 22000:2018.
- 2.2.2 The expiry date of certifications to ISO 22000:2005 issued during the transition period needs to correspond to the end of the three year transition period.



### **3. NABCB Plan for transition**

**3.1** In the absence of any IAF guidance, NABCB has decided to follow the plan detailed in this document.

**3.2 Guidance for Certification Bodies** – The certification bodies are expected to follow as given below:

- (i) Accredited certifications to ISO 22000:2018 shall only be issued once the CB has been accredited to deliver certification to the new standard and after the organization has demonstrated conformity to ISO 22000:2018
- (ii) CBs can conduct transition activities during a routine surveillance, recertification audit or a special audit.
- (iii) Where transition audits are carried out in conjunction with scheduled surveillance or recertification (i.e. progressive or staged approach), then a minimum of **1 auditor man-day** is required to be added to cover existing and new requirements implied by ISO 22000:2018.
- (iv) Recognizing that each client and transition audit is unique, the audit duration will be increased above the minimum as needed to sufficiently demonstrate conformity to ISO 22000:2018.
- (v) CBs shall communicate their transition arrangements to their clients at the earliest.
- (vi) CBs shall develop transition plans, to address the following:
  - a) Training and verification of competence of auditors and other staff.
  - b) The CB's arrangements for communicating with its clients.
  - c) Timelines for transition of existing clients to ISO 22000:2018 as well as for existing applicants and the cut-off date beyond which the CB will not accept applications as per the old standard.
  - d) The CB's arrangements for auditing conformity to the new standard (for example, will it be a single visit or a staged approach.)
  - e) How the CB will ensure clients' ongoing conformity to ISO 22000:2005 through the transition process.
  - f) How the CB plans to use the results of any evaluation activities conducted during the DIS or latest draft stage document before the ISO 22000:2018 was published, if any.
  - g) Action to be taken in respect of clients that have failed to complete the transition by three years after the publication of ISO 22000:2018. For example, the level of audit necessary for certification to be restored.

#### **3.3 CBs shall also ensure the following:**

- a) Smooth transition of existing clients to ISO 22000:2018 version, before the expiry of the previous version of the standard.
- b) All issues that require client action for conformity with the new requirements shall be clearly identified and raised as documented findings. Based on the cut-off date decided, the findings can be raised as observations up to the cut-off date, to be converted in to NCs thereafter.
- c) Only when all identified outstanding issues have been appropriately



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addressed and the effectiveness of the management system demonstrated, can auditors recommend certification to the published ISO 22000:2018 standard.

- d) Records should be available to demonstrate that all prior transition audit findings have been evaluated for corrective action and conformity before any recommendation for approval to ISO 22000:2018 can be made.
- e) The evaluation of a client's conformity to the new requirements during the transition phase does not interfere with the client's on-going conformity to ISO 22000:2005
- f) The decision to issue certification to ISO 22000:2018 shall only be made once actions in respect of all outstanding major non-conformities have been reviewed, accepted and verified and the client's corrective action plan for any minor non-conformities has been reviewed and accepted.

### **3.4 Steps planned to be taken by NABCB**

The following items will be considered by NABCB AT while assessing transition, through offsite document review, onsite assessment and witness assessments as applicable:

- (i) Adequacy of the transition plan drawn out by the CB to ensure smooth transition of its clients to the standard ISO 22000: 2018 and its implementation.
- (ii) Adequacy of the changes made by the CB in its documentation system (including procedures, format, etc) reflecting the changed requirements to ensure effective transition and the implementation of the documented system
- (iii) Training and verification of competence of assessors and other staff
- (iv) Demonstration of appropriate skills and knowledge, as identified by the CB, based on the requirements of ISO/TS 22003 and ISO 22000:2018 including evaluation of achieved competence. Identification of competence criteria (Skills and knowledge) shall include knowledge and understanding of risk analysis techniques and mitigation strategies and ability to audit the risk based thinking by the clients in accordance with the new approach adopted in ISO 22000:2018 and shall include all functions of the CB involved in certification activities.
- (v) Assessments that include the transition to ISO 22000:2018 shall focus on changes to be implemented by CBs as a result of implementing the new standard; primary consideration will be given to consistent interpretation of the requirements, competence, reporting and any associated change in audit methodology. The assessment will also review the CB's transition arrangements for its certified clients
- (vi) For accredited CBs that have issued only accredited ISO 22000:2005 certificates, **at a minimum NABCB shall conduct a documentation review for a minimum of one assessor man-day.** This can be done during an onsite assessment, if desired by the CB.
  - a. If the output of the review is positive, the new accreditation certificate may be issued



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- b. If the output is negative, NABCB will decide about any additional evaluation needed (i.e. additional documentation review or an office assessment)
- c. ISO 22000:2018 promotes the need to demonstrate system effectiveness and the application of risk-based thinking through the process approach, which would generally result in the need for a change in auditing techniques. Hence, as part of verification of transition, NABCB may carry out one or more witness assessments. The witness assessments can be done after approval of transition by NABCB based on review of documentation

### **4.0 Implementation**

Keeping in view the 3 year transition period of IAF, NABCB has approved the following policy for transition:

1. All CBs, accredited/applicants to ISO/IEC 17021-1 and ISO/TC 22003 for FSMS scheme, shall submit a plan for transition by 31 December 2018. The plan shall clearly indicate the date by which the CB would transition to ISO 22000:2018.
2. Any application for accreditation pending on 31 December 2019 shall be processed for accreditation only after the CB demonstrates that it has switched to ISO 22000:2018
3. All applications after 31 December 2019 would be accepted for certification to ISO 22000:2018
4. All assessments of accredited/applicant CBs, after 31 December 2019, shall be for certification as per ISO 22000:2018. Any request for assessment before this date for certification against ISO 22000:2018 shall be accepted.
5. Any non-compliance relating to implementation of the revised version of ISO 22000:2018 shall be raised as Concern till 30 June 2020 after which they shall be raised/upgraded as NCs and would have to be addressed by CBs within prescribed timelines.
6. After 30 June 2020, CBs shall conduct all FSMS initial, surveillance, and recertification audits to the new standard (ISO 22000:2018). The outcomes of such audits shall be considered by the CB for further decision on accredited certifications to ISO 22000:2018 as deemed appropriate.
7. Since IAF has declared a 3 year transition policy from June 2018 (date of publication of the ISO 22000 standard), the above arrangement of timing the transition assessment (document review) would continue till 31 December 2020. Thereafter, CBs who have not followed up on informing the changes and getting the changes reviewed, would be subject to a special office assessment organized for the transition as per item **3.4 (vi)** described above.



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This policy shall apply to all accredited and applicant certification bodies (CBs) seeking accreditation by NABCB for the provision of FSMS certification.

This policy shall remain current until 29 June 2021.

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