

**IndiaHACCP Certification Scheme  
Requirements for Certification Bodies**



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# Requirements for Certification Bodies

## 1. Scope

1.1 This document elaborates on the requirements specified in ISO/IEC 17021-1 and ISO 22003, as applicable to the Certification Bodies (CBs) operating under the IndiaHACCP Certification Scheme, hereinafter referred to as Scheme.

## 2. Objectives

2.1 The additional requirements described in this document shall form the necessary adjunct to the requirements prescribed in ISO 17021-1 and ISO 22003, and will also need to be complied with by the Certification Bodies, in addition to the Certification process requirements prescribed in the document “ IndiaHACCP Certification Scheme - Certification Process”, to be approved under the Scheme.

## 3. General requirements

### 3.1 Legal responsibility

3.1.1 In addition to the requirements specified in clause 5.1.1 of ISO/IEC 17021-1 the following requirements shall also apply.

3.1.2 CBs which are part of government, or are government departments, shall be deemed to be legal entities on the basis of their governmental status. The status and structure of such bodies' shall be formally documented and the bodies shall comply with all the requirements of this document.

3.1.3 The accreditation shall be granted to a legal entity, who can be legally held responsible for its work, irrespective of whether the entire organization or a part of it performs the certification functions.

### 3.2 Certification agreement

3.2.1 The CB shall have a legally enforceable agreement for the provision of certification activities to its client organizations. Certification agreements shall take into account the responsibilities of the CB and its client organization.

3.2.2 The CB shall in addition to requirements of ISO 17021-1 ensure that its certification agreement requires that the client also comply with the following:

- a) always fulfill the certification requirements as specified in the document “ IndiaHACCP Certification Scheme - IndiaHACCP Certification Criteria ”, Certification scheme and process requirements as specified in the document “ IndiaHACCP Certification Scheme – Certification Process ” and the requirements specified in this document as applicable and the changes in them as communicated by the CB, time to time;
- b) make all necessary arrangements for the conduct of the audits, including provision for examining documentation and the access to all processes and areas, records and personnel for the purposes of initial certification, surveillance, recertification and resolution of complaints;
- c) make provisions, where applicable, to accommodate the presence of observers (e.g. accreditation body assessors or trainee auditors);
- d) When the certification scheme introduces new or revised requirements both in Certification criteria and Certification process requirements that affect the applicants and the certified organizations, the client shall implement the changes in their India HACCP systems, necessitated by these changes.
- e) the client shall inform the CB, without delay, of matters that may affect its ability to conform to the certification requirements. These shall include:
  - i) modifications to the products and/or processes and the production methods,
  - ii) Major changes in manufacturing equipment and in the internal control measures

- iii) Major changes to the GHP and HACCP systems as specified in the certification criteria.
- iv) Any other information indicating that the IndiaHACCP system may no longer comply with the requirements of the IndiaHACCP Certification Criteria and the certification scheme as prescribed under the IndiaHACCP Certification Scheme.
- f) ensure that accredited certification shall not be used by itself or its clients for promotional or publicity purposes in any way that QCI considers to be misleading, and take such immediate steps as QCI may require to correct any such misleading use.

**3.2.3** The client shall agree for re-audit by the CB as per the requirement of the certification scheme, in the event of changes significantly affecting their capability to comply with the requirements of the certification scheme.

**3.2.4** The client shall also agree for re-audit by the CB, in the event of changes in the Certification Criteria.

**3.2.5** The CB shall document clear instructions regarding appropriate use of certification mark and for providing information about certification status by its clients. It shall also identify the aspects that would be considered as misleading and unauthorised as relevant to the relevant certification scheme. The certification agreement shall make appropriate cross references to the above document, so as to make it legally binding. (Refer to clause 6.2).

**3.2.6** In addition to the requirements as specified above the requirements specified vide clauses 6.2 and 6.3 shall also be part of the agreement with the client.

### **3.3 Management of impartiality**

**3.3.1** The top management's commitment to impartiality shall be demonstrated through:

- a) Documenting the CB's policy on safeguarding impartiality and ensuring that it is understood at all levels of the organization.
- b) Having a defined institutional structure and impartiality policy and procedures, appropriate implementation of these policy and procedures and operation and conduct of its activities and personnel.
- c) Having a system that ensures appropriate management of conflict of interest for ensuring objectivity of its certification functions.
- d) Taking action to respond to any threats to its impartiality arising from the actions of other parts of the organization, persons outside of the organization, subcontractors, related bodies or other bodies or organizations.
- e) Maintaining a professional environment and culture in the organization that supports a behaviour of all personnel that is consistent with impartiality.
- f) Making available to public through its website, its policy on impartiality.

**3.3.2** The CB shall ensure that a conflict of interest analysis is carried out at least once annually and whenever a significant change occurs in the CB's activities, such as changes in the organizational structure and business activities or of the legal status and mergers with, or acquisitions of other organizations.

**3.3.3** In addition to the requirement specified in ISO 17021-1 clause 5.2, the following shall also apply:

- a) The CB shall not have any direct relationship with its client other than certification work and third party conformity assessment.
- b) If the CB and its client are both part of government, the two bodies shall not directly report to a person or group having operational responsibility for both. The CB shall, in view of the impartiality requirement, be able to demonstrate how it deals with a case where both itself and its client are part of government. The CB shall demonstrate that the applicant receives no advantage and that impartiality is assured.

- c) The CB, any group within its control and organizations related or linked to certification bodies or personnel, employed or contracted, in an organization within its control, shall not offer or provide consultancy or training on the product that it certifies.
- d) The CB, any group within its control and organizations related or linked to certification bodies or personnel, employed or contracted, in an organization within its control, shall not offer or provide management system consultancy or internal auditing to its clients/prospective clients.

**Note:** The CB is allowed to explain its findings and/or clarify the requirements of the normative documents but shall not give prescriptive advice or consultancy as part of an audit.

**3.3.4** The CB's personnel involved in certification activities shall be bound by the CB's impartiality policy and act impartially in their work through contractual or employment conditions and assignment conditions for each audit activity.

**3.3.5** The CB's personnel involved in certification activities shall not provide, while carrying out audit, any advice, consultancy or recommendation to the client on how to address any deficiencies that may be identified during the audit.

**3.3.6** The CB should be responsible for ensuring that neither related bodies, nor sub-contractors, nor external auditors operate in breach of the undertakings that they have given. It should also be responsible for implementing appropriate corrective action in the event that such a breach is identified.

#### **3.4 Liability and financing**

**3.4.1** The CB shall be able to demonstrate that it has a reasonable expectation of being able to provide and to continue to provide the service in accordance with its contractual obligations. Certification bodies shall also be able to provide sufficient evidence to demonstrate its stability, e.g. management reports or minutes, annual reports, financial audit reports, financial plans, etc.

**3.4.2** The means by which the CB obtains financial support should be such as to allow the CB to retain its impartiality.

**3.4.3** In addition to the above the CB shall also demonstrate that initially, and on an ongoing basis, commercial, financial or other pressures do not compromise its impartiality.

#### **4. Structural requirements**

##### **4.1 Organizational structure and top management**

**4.1.1** In addition to the requirements specified in clause 6.1 of ISO 17021-1, the following requirements shall also apply.

**4.1.2** The organization structure shall include structure of the parent body (legal entity) if separate from the department/division that offers certification.

**4.1.3** It shall also include structure of the related departments in relation to the department offering certification services.

**4.1.4** The CB shall identify and document all related bodies (separate legal entities) as well as other departments of the same legal entity and their activities and functions and their relationships with the CB when describing its organizational structure.

**4.1.5** An organization chart(s) shall be used for showing the structure, supported by the documented responsibilities and authorities for the functions described in the organization chart.

**4.1.6** Committees if any, involved in operation of the CB and the certification process, shall also be shown as part of the organizational structure.

**4.1.7** The identification of responsibilities, however done, shall clearly and unambiguously reflect the responsibilities for activities/functions as described vide clause 6.1.3 of ISO/IEC 17021-1.

**4.1.8** The requirement specified above shall also apply to all committees, if any established by the CB for certification review and decision making, appeals process, etc.

## **5. Resource requirements**

### **5.1 Competence of personnel**

#### **5.1.1 Determination of competence criteria**

**5.1.1.1** The CB shall determine the Competence Criteria for each technical area, the technical areas shall be those categories identified in Annex A of ISO 22003, as also for the functions of certification as identified in Annex C of ISO 22003. The competence criteria shall document the required knowledge and skills necessary to effectively perform audit and certification tasks to be fulfilled to achieve the intended results.

**5.1.1.2 Competence of Auditor** – In addition to the requirement given above, every person undertaking audits shall have the appropriate qualification, training, experience and skills to perform it.

- a) Education - The CB shall ensure that auditors have at least post-secondary education preferably diploma/graduation in any stream of science relevant to food sector that includes general microbiology and general chemistry as subjects. It shall also ensure that they have the knowledge of products, processes, good manufacturing and hygienic practices, and testing, as per applicable Regulations. For any exemption from these requirements, the Certification Bodies shall approach the scheme owner.
- b) Work Experience – The auditors shall have at least 5 years of full time post qualification experience in food chain related industry, including at least two years of work in food safety within manufacturing, retailing, inspection or enforcement, or the equivalent for the two years work experience.
- c) Training - The CB shall ensure that auditors have successfully completed training in audit techniques and training in applicable food safety standard or equivalent.
- d) Audit Experience – The CB shall ensure that within the last three years, the auditor has performed at least 20 man-days of food safety audits covering principles of HACCP in at least 4 organizations for an equivalent standard, under the leadership of a qualified auditor, and this demonstration has met with acceptance of the qualified auditor. The time spent by the observer/trainee shall not count towards time spent on audit.

For maintaining the qualification of the auditor, the CB shall ensure that auditor has performed a minimum of 5 man-days of audits covering principles of HACCP per year. CB shall define competence for other personal involved in certification systems other than auditing functions.

#### **5.1.2 Evaluation processes**

**5.1.2.1** The CB shall as a minimum use at least two (2) of the possible evaluation methods for evaluating individual's competence, as described in Annex B of ISO 17021-1, since it is unlikely that any one method on its own will confirm competence.

### **5.2 Use of individual external auditors and external technical experts**

**5.2.1** The CB shall require external auditors and external technical experts to have a written agreement by which they commit themselves to comply with applicable policies and procedures as defined by the CB. The agreement shall address aspects relating to confidentiality and to independence from commercial and other interests, and shall require the external auditors and external technical experts to notify the CB of any existing or prior association with any organization they may be assigned to audit.

**5.2.2** The contract shall also require the personnel to proactively declare about affiliations (personal and professional) and other jobs/associations like consultancy, etc which may have potential for presenting conflict of interest. It shall also include information about any other association that the individual feels has the potential for threat to impartiality.

### **5.3 Outsourcing**

**5.3.1** The CB operating the IndiaHACCP Certification Scheme shall not outsource any activity.

## **6. Information requirements**

### **6.1 Public information**

**6.1.1** Making the information publicly available through the CB's website shall be the only means of meeting this requirement including the following .

a) The CB shall maintain and make publically available the list of applicants registered, certifications granted with scope of certifications, and current status of certification including suspensions and withdrawals.

**6.1.2** The CB shall have procedure for frequent updating of the information on its website. The responsibilities for ensuring accuracy of the information made available on the website, ensuring frequent updates, etc shall be documented.

**6.1.3** The information about fees charged shall clearly provide the basis on which the fees are charged. It may be generic in nature; however it shall give some basic information about the CB's fee structure.

**6.1.4** The information on complaints handling process and the CB's procedure shall be directly available to the public, without the public having to go through layers of cross linkages.

### **6.2 Reference to certification and use of marks**

**6.2.1** The IndiaHACCP Certification Scheme does not allow for affixing of any Mark on the products. The CB shall ensure that the applicants and the certified clients are not affixing any mark on products or the product packaging that may be interpreted as denoting product conformity.

~~**6.2.2**~~ The CB shall have rules governing the use of any statement on product packaging or in accompanying information that the certified client has an IndiaHACCP system approved under this Scheme.

**6.2.3** The CB shall not allow the accreditation mark to be used on the products and/or product packaging.

**6.2.4** The CB shall have documented procedures describing the measures to be adopted in case of misuse, including false claims as to certification and false use of CB marks and these shall be part of its agreement with the certified clients.

**6.2.5** The CB shall have a documented procedure for dealing with instances of non-compliances with respect to the specified requirements for use and display of Marks, certificates, as per its own procedure and those prescribed in the Certification Process requirements under the IndiaHACCP Certification Scheme.

**6.2.6** The procedure shall include the process steps and the actions (including penal actions as relevant), the CB intends to take in the event of observing misuse/misleading use of certificates and the presence of a Mark on the product indicating a product is certified, found in documentation or other publicity.

### **6.3 Confidentiality**

**6.3.1** In addition to the requirements specified in ISO 17021-1 (clause 8.4) following shall apply:

**6.3.2** The CB shall have a documented policy and mechanism to safeguard the confidentiality of information obtained or created during the course of certification activities. It shall also be part of the certification agreement.

**6.3.3** Personnel, including any committee members, contractors, personnel of external bodies or individuals acting on the CB's behalf, shall keep confidential all information obtained or created during the performance of the CB's activities. There shall be a mechanism such as obtaining signed confidentiality agreements, etc, for ensuring the same.

**6.3.4** The CB shall have available and use equipment and facilities that ensure the secure handling of confidential information (e.g. documents, records).

**6.3.5** In case of transfer of certificate or application, when the client decides to move from one CB to another CB, the CB to which the client is now moving may ask the previous CB for information on the reasons for such movement or the performance of the client with respect to the certification requirements. Such information shall not be considered as confidential and the CB shall inform its client of this requirement, in advance, through agreements, etc.

#### **6.4 Certification Fees**

**6.4.1** The CB shall charge a fee in a non discriminatory manner.

**6.4.2** The CBs fee structure shall be publically accessible and also be provided on request.

**6.4.3** CB shall notify and obtain consent to its fee structure from the organizations prior to grant of certification. As and when the fee undergoes a change, the same shall be communicated to all including applicants and the organizations certified under this scheme of certification for their acceptance.