

	Accreditation Criteria for Inspection Bodies performing Food Inspections	G-24/08 Issue Date: 08/07/08 Rev No: 00
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1 INTRODUCTION

- 1.1 This document has been produced by the Pakistan National Accreditation Council (PNAC) in conjunction with the PNAC Sectoral Committee for Inspection Bodies. It provides guidance to those requirements in ISO/IEC 17020 and Agreement between PNAC & IBs (F-01/13) that need interpretation when applied by Inspection Bodies carrying out Food Inspections. It does not cover all of the requirements of ISO/IEC 17020-*General criteria for the operation of various types of bodies performing inspection* and Agreement between PNAC & IBs (F-01/13). Inspection Bodies are reminded of the need to comply with all of the requirements in these documents. Appeals concerning interpretation will be considered in accordance with the PNAC Appeals Procedure. Other PNAC documents may be referred to where relevant.
- 1.2 For the purposes of this document the term '*inspection body*' shall be taken to mean an accredited inspection body.

2 Definitions

- 2.1 Inspection & inspection body are defined in the standard. Clarification is given below on other terms, some of which have gained common usage in the food industry; Care should be taken in standards, policies and procedures to ensure clarity of meaning.

2.1.1 Accreditation

Procedure by which an authoritative body gives formal recognition that another body or person is competent to carry out specific tasks. PNAC is a autonomous body working under the Ministry of science & technology Government of Pakistan as the sole body responsible for providing accreditation of inspection bodies in accordance with ISO/IEC 17020.

2.1.2 Audit

Used in the food industry to mean inspection of a process and the process controls; see also 'internal quality audit'. ('Quality audit' has a more specific meaning within the ISO 9000 series of standards).

2.1.3 Client

In the context of ISO/IEC 17020, the client is the party that commissions work from the inspection body.

2.1.4 Consultancy


Participation in an active creative manner in the development of the processes to be assessed. For example by:

- (a) Preparing or producing manuals, handbooks or procedures.
- (b) Participating in the decision making process on management system matters.
- (c) Giving specific advice towards the development of facilities and the implementation of processes.

Consultancy may prejudice the impartiality of the Inspection body in breach of clause 4 of the standard. Further guidance is given at the appropriate point in this document.

2.1.5 Field, type & range of inspection

The scope of accreditation shall be precisely defined in terms of the field, type and range of inspection.

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2.1.5.1 Field

Field of inspection will be the specific area of the food chain. Sub-divisions are indicated in Annex 1.

2.1.5.2 Type

Type of inspection will be either for *Statutory Enforcement* or *Inspections for purposes other than statutory enforcement*.

2.1.5.3 Range

Range of inspection may specify one of a number of criteria, for example food safety, food standards, food quality and so on. Further examples are given in Annex 1.

2.1.6 Internal quality audit

In the context of ISO/IEC 17020, a planned and documented audit, conducted by or on behalf of the inspection body, of the implementation of the procedures and systems of the inspection body to verify compliance with the criteria of ISO/IEC 17020 and the effectiveness of the quality system.

3 Administrative requirements (clause 3, ISO/IEC 17020)

- 3.1 Food inspections may be conducted for a wide range of purposes at any point in the food chain; further detail on the fields, types and ranges of inspection is given in Annex 1. The scope of an inspection is required to be transparent and documented in a contract or work order.
- 3.2 Further interpretation of this sub clause may be needed for statutory enforcement situations where there are legal rights of access.
- 3.3 The range of inspection services offered by a body may be wider than those which are accredited. In this case the limits of accreditation shall be made clear. Services that are outside the scope of accreditation shall be distinguished from those that are accredited.
- 3.4 Liability insurance shall include Employers liability, Public Liability and Professional Indemnity. Type B bodies, engaged only for 'in-house' inspections may not require professional indemnity insurance.

4 Independence, impartiality and integrity (clause 4, ISO/IEC 17020)

- 4.1 In some areas of food inspection the provision of consultancy services will be a significant factor affecting the impartiality of the body. Bodies shall have adequate separation of activities or staff to be able to demonstrate that inspection is not prejudiced by conflicts of interest. A definition of consultancy is given in 2.1.4. Inspection bodies may normally carry out the following activities without them being considered as consultancy or being potential conflicts of interest:
 - a. Normal inspection activities including planning & information meetings, examination of documents, auditing and follow up of non-compliances.
 - b. Arranging and participating as a lecturer in training courses, provided that where these courses relate to quality assurance, inspection standards and any food topics related to the inspection services, they should confine themselves to provision of generic information that is in the public domain, i.e. they should not provide company specific advice that may contravene clause 2.1.4c.
 - c. Making available or publishing information on the Inspection Body's interpretation of the requirements of the inspection standard.
 - d. Activities prior to inspection aimed solely at determining readiness for inspection. Such activities should not result in the provision of recommendations or advice that would contravene the requirements of (a) to (c) in 2.1.4. The inspection body should be able to confirm that such activities do not contravene these requirements and that

- they are not used to justify a reduction in duration of the eventual inspection.
- e. Performing inspections according to standards or regulations other than those being part of the scope of accreditation.
 - f. Adding value during inspection visits, for example by identifying opportunities for improvement as they become evident during inspection, but without recommending specific solutions.
- 4.2 Inspection must remain, and be seen to remain, impartial. Consultancy by a related body must never be marketed together with inspection services and there should be no indication in marketing material (written or oral) to give the impression that the two are linked. It is the duty of the inspection body to ensure that no client is given the impression that the use of both consultancy and inspection services would confer an advantage. There should be no suggestion by an inspection body that a successful inspection outcome would be cheaper or facilitated by the use of any specified consultancy or training services.
- 4.3 The above deals with possible compromise of impartiality by other activities of the inspection body or a related body. In some circumstances the activities of personnel may cause a similar conflict. Two situations in particular are considered. Firstly, the personnel of the inspection body may not necessarily be full-time personnel; their other employment shall not be such as to compromise their impartiality. Secondly, full time employees who have recently joined an inspection body may have a potential conflict of interest as a result of previous employment. In either case, an individual should not perform an accredited inspection on a business where such a conflict may exist, within a period of at least 2 years.
- 4.3 In both cases, the following three elements shall be included in the inspection body's procedures so that impartiality may properly be assessed by both the inspection body and PNAC:
- a. Job descriptions for the actual inspection role detailing the nature of the task.
 - b. A declaration of inspector interests detailing all other interests that may impact on their impartiality.
 - c. A procedure whereby a client has prior notification of the identity of an inspector and is given an opportunity to identify any possible conflict of interest.
- 4.4 The inspection body has a responsibility to identify and evaluate such situations and assign responsibilities and tasks so as to ensure that impartiality is not compromised.
- 4.5 Inspection bodies carrying out food inspection may be accredited as Type A, B or C bodies, provided they meet the necessary requirements.
- 4.6 Type A bodies shall be independent third parties engaged in inspection only. Bodies also involved in consultancy are unlikely to meet all the independence criteria in A.1 of annex A of ISO/IEC 17020.
- 5 Organisation and Management (clause 6, ISO/IEC 17020)**
- 5.1 The role of the technical manager is to oversee the technical content and competence of the inspections and to ensure that PNAC requirements are met. The technical manager shall be a permanent member of staff and will normally be different from the person responsible for quality assurance indicated in ISO/IEC 17020, sub-clause 7.4, although the extent to which different staff members can hold several functions can vary with the size of the organisation. The position of technical manager in the organisation, however named, shall be shown clearly in the organisation chart.
- 5.2 The inspection body shall be able to demonstrate that the work of staff performing inspections is properly supervised by a person familiar with the inspection methods and procedures and the scope and objectives of the inspection. The level of supervision shall be commensurate with the skills and experience of the inspector. Supervision shall also include regular review of inspection reports to ensure that work has been carried out in accordance with the client's requirements and the Inspection body's procedures.

- 5.3 It is permissible to deputize upwards in the management structure as well as downwards.
- 5.4 Requirements for education, training, qualifications and experience should be consistent with the competence criteria described against sub-clause 8.2.
- 6 Quality system (clause 7, ISO/IEC 17020)**
- 6.1 The policy statement shall include a commitment to compliance with ISO/IEC 17020.
- 6.2 The quality manager has a key position which shall be identified on the organisation chart. The quality manager may have other duties but shall have direct reporting access to top management for quality matters. This is a different function to that of the technical manager described in sub-clause 6.3 and, as a rule, it should be the job of a different person.
- 6.3 The purpose of internal quality audits is to verify that the documented operational procedures of the inspection body are being implemented. Internal audit shall include the on-site assessment of staff conducting inspections. This assessment shall be carried out by personnel with the relevant technical qualifications and experience who have been trained in internal auditing and who are sufficiently independent to carry out the assessment audit objectively.
- 6.4 The internal audit programme for on-site assessments shall be designed so that every year it shall include at least one inspection of every field, type and range for which the body is accredited. At the same time, the plan shall ensure that every inspector is assessed on-site at least once in a four year period for every field, type and range of inspection for which he/she is considered to be competent.
- 6.5 System review should take place at least once per year.
- 7 Personnel (clause 8, ISO/IEC 17020)**
- 7.1 Permanent staff shall be under contract to the inspection body and shall have signed to confirm that they understand and will comply with the inspection body's quality policy and procedures. Staff retained on a long term contract but deployed only part time will be regarded as permanent staff provided that, when they work for the inspection body, they shall work under the inspection body's quality systems and procedures. The inspection body shall ensure that staff of this type do not cause any conflict with other requirements of ISO/IEC 17020. In particular the inspection body shall ensure that other work in which these staff engages does not prejudice their impartiality and integrity in breach of ISO/IEC 17020. The potential for conflict with the confidentiality requirement (ISO/IEC 17020, clause 5) should also be considered.
- 7.2 Inspection staff shall have qualifications, training and/or experience to match the specific inspection tasks in which they are employed; the inspection body shall be able to demonstrate procedures to ensure this. More specific guidance for particular inspection fields is included in Annex 2.
- 7.3 The records shall indicate the competency of every member of staff engaged in specific inspection tasks in the fields, types and ranges of inspection covered by the scope of accreditation and the date of their authorization.
- 8 Facilities and equipment (clause 9, ISO/IEC 17020)**
- 8.1 The provisions of clause 9 shall be met where the inspection body uses its own equipment for tests or measurements to determine compliance with the inspection standard. If inspectors rely upon equipment already installed in the premises (or vehicle) under inspection to make such tests or measurements, the inspection body shall ensure that this equipment also meets the criteria of clause 9. Appropriate provisions should be included in the inspection methods and procedures.
- 8.2 If equipment is used by the company being inspected, but not by the inspection body itself, the requirements of clause 9 will not apply. The inspection standard against which the inspector judges conformity may place similar obligations for control, calibration, maintenance etc. of equipment used by the organisation under inspection, but the inspector

shall apply the specific requirements of the inspection standard and not superimpose requirements from clause 9.

9 Inspection methods and procedures (clause 10, ISO/IEC 17020)

- 9.1 The inspection body shall ensure that inspection methods to be used are documented and consistent with the scope of the inspection. Where inspection is carried out to determine legal compliance, procedures shall have regard for all the requirements of the relevant Regulations.
- 9.2 The inspection frequency shall be properly planned to achieve an efficient inspection process. The frequency should be related to 'risk' in all its aspects, including the inherent risks of the product or process and the past record of the business. The criteria for planning inspection frequency shall be documented.
- 9.3 The inspection body shall have detailed inspection criteria which are documented and validated especially when published methods are not used.
- 9.4 The scope of inspections shall be clearly defined with respect to field, type and range of inspection (see Annex 1).

10 Records (clause 12, ISO/IEC 17020)

- 10.1 Procedures shall define the records to be kept and the form in which they are to be kept. The period of retention of documents by the inspection body shall be defined; for inspection and complaint records at least 5 years would normally be appropriate and 3 - 5 years for quality system records.

11 Inspection reports and inspection certificates (clause 13, ISO/IEC 17020)

- 11.1 Certain elements of the inspection report are mandatory as outlined in EA-5/01. The scope of the inspection shall be included in the inspection report in order to allow proper understanding and interpretation. Inspection bodies should have procedures to ensure that inspection reports are delivered to the client in accordance with contractual requirements.

12 Sub-contracting (clause 14, ISO/IEC 17020)

- 12.1 Work shall only be sub-contracted in exceptional cases, for example sickness or temporary overload. Accreditation is only granted to a body that demonstrably has the staff and the expertise to carry out the normal functions for which accreditation is sought (see also ISO/IEC 17020, sub-clause 8.1).
- 12.2 When sub-contractors have to be used the inspection body shall sub-contract to another body accredited to ISO/IEC 17020 by PNAC or accreditation body recognized by PNAC. When laboratory testing forms part of the inspection, the laboratory shall be accredited against ISO/IEC 17025 by PNAC or accreditation body recognized by PNAC.

13. REFERENCES

ISO/IEC 17020, General Criteria for the Operation of Various Types of Bodies Performing Inspection

IAF/ILAC-A4: 2004, Guidance on the Application of ISO/IEC 17020

FIELDS, RANGES, AND TYPES OF INSPECTION

Fields of inspection

Six broad areas of inspection have been identified. Food Processing has been categorized into six fields, as listed below. Organisations applying for accreditation or extensions of scope should use these fields in their applications:

Food Processing

1. Raw Meat & Fish
 - i. Red Meat, Slaughter & cutting
 - ii. Poultry Meat, Slaughter & cutting
 - iii. Fish, Chilled and frozen
 - iv. Raw meat products and preparations
 - v. Raw fish products and preparations
2. Produce (Fruit & Vegetables)
 - i. Fresh & frozen
3. Dairy
 - i. Chilled and frozen
 - ii. Egg
4. Ready to eat or heat (chilled & frozen), including cooked meat/cooked fish products
5. Ambient stable, heat preserved, hermetically sealed packs
6. Ambient Stable Foods (Other)
 - i. Beverages
 - ii. Bakery products ~ ambient
 - iii. Dried foods
 - iv. Confectionery
 - v. Snacks and breakfast cereals
 - vi. Oils & fats
 - vii. Food ingredients

Other areas of inspection are listed below; they will be divided into fields as necessary:

- Animal feeds
- Farm
- Wholesale/Distribution Retail stores
- Catering premises

Ranges of inspection

Ranges of inspection will describe the technical issues covered by the inspection:

- Human Food safety
- Animal Health
- Animal Welfare
- Composition, standards and labeling
- Workplace Health & Safety Legislation

Types of Inspection

- Statutory enforcement
- Non-statutory

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Annex 2

QUALIFICATIONS, TRAINING AND EXPERIENCE

Entry level Qualifications

The inspector shall have a minimum of post-graduate in Food technology/HSE or equivalent in a food or bioscience related discipline.

Training

The inspector shall have knowledge and raining on ISO 9000 series courses and have undergone a supervised period of training in practical assessment. He or she shall also have knowledge and training on HACCP based on the principles from Codex Alimentarius, and be able to demonstrate competence in the understanding and application of HACCP principles.

It is essential that training courses are recognized by the industry (and its stakeholders) as being appropriate and relevant. For example, approval or certification by an independent body with the relevant expertise can provide some assurance that a course meets specified criteria.

Experience

The inspector shall have a minimum of five years post-graduate experience related to the food industry. This shall involve work in Quality Assurance or food safety functions within manufacture, retailing, inspection or enforcement.

Training and Experience for specific inspection fields and ranges

Inspection bodies shall be able to demonstrate that every inspector has appropriate training and experience for the particular fields, types and ranges for which they are considered competent. Inspector competence shall be recorded (ISO/IEC 17020, clause 8.4) at least at the level of each field of inspection and its first sub-division as indicated in Annex 1.

It is difficult to be prescriptive as to the specific training required in the absence of nationally recognized training modules. Necessary training and experience must be judged on the 'risk' and the particular technical demands of the field.