IFS
PIA
Product Integrity

FAQ FOR
IFS PRODUCT INTEGRITY ASSESSMENT

March 2019

FAQ, IFS PIA

The aim of this document is to provide answers for the most frequently asked questions about IFS PIA version 1.

1 GENERAL ON THE IFS PIA CONCEPT

1.1 What is IFS PIA?

IFS PIA – IFS Product Integrity Assessment is an assessment program to check a company's management of product integrity risks: is the company able to fulfill the customer specification in such a way that a product fully complies with everything what is communicated and what on that basis may be expected.

Product integrity does not only relate to the production processes in the production plant but also to administrative processes as well as to the supply chain and how the company handles raw material related risks (food fraud, claims etc.).

1.1.1 What is the goal of the IFS PIA?

The IFS PIA is a benchmark assessment for integrity management of food products. It is not a certification standard. The set of requirements in this assessment is the benchmark. Companies (suppliers) can decide how and to what degree they want to comply with these requirements. Customers can decide what they expect from their suppliers and what degree of compliance they find acceptable.

Insight is given in the companies' management of product integrity by means of an assessment against the IFS PIA checklist, an assessment report & assessment score, an action plan and a professional conclusion of the assessor. The assessment score is an indication of the degree of compliance with this benchmark.

1.1.2 What is the definition of “product integrity”?

Guarantee that a product fully complies with what is communicated (all elements of the product specification) and what on that basis may be expected (so: including marketing claims).

1.1.3 Is the IFS PIA only covering the meat product scope or will it apply to other product scopes, as well?

The IFS PIA will be applicable for all food products. Different from the IFS Food Standard, there will be no product scopes here.

1.1.4 What are the main differences between IFS Food and IFS PIA?

- The IFS PIA is rather to be regarded as complimentary to and in interaction with the IFS Food. IFS Food approaches risk from the point of view of food safety and quality systems. IFS PIA approaches risk from the point of view of the product: is the auditee able to fulfill specific customer specifications and in other words can the clients trust that products they buy from the company fully comply with everything what is communicated and what on that basis may be expected.
- As a consequence, IFS PIA integrates the product and especially its raw materials in the assessment: next to the general checklist, the assessor will define parameters based on risk profiles of the critical raw materials that are handled by the company. Also, retailers will be invited to hand in a product they buy from the company – the assessor will analyse these product specifications and summarize these and add them to the parameters that will be checked during the assessment.
- Fraud is also part of the IFS Food standard, but less detailed. The IFS PIA additionally focusses on unintentional integrity issues.
- IFS Food is an accredited, GFSI recognized standard. IFS PIA is not accredited and the protocol is primarily geared to creating a solid basis for trust between the company and their clients, and for dialogue and improvement of product integrity systems in the supply chain.

1.1.5 How can I participate in the development of IFS PIA?

The IFS PIA Working Group is open for any interested retailer and manufacturer member of the IFS International Technical Committee (ITC). In addition the results of each IFS PIA WG will be circulated to the ITC and National Working Groups. So, everyone can give their feedback.

1.2 Question about the role of IFS in the development of the IFS PIA (different from current role)?

IFS is the standard owner of the IFS PIA. So, the IFS ITC has to validate the IFS PIA process. The development of IFS PIA has its base on the experience of Ahold and other Dutch retail product integrity assessments. So we don't start from scratch.

1.3 How will it work: what will be the process of the IFS PIA?

The company will receive a questionnaire about their products and critical raw materials, this will provide input for IFS to prepare risk profiles for the assessor for the preparation of the assessment. The retailers who are client of the company will be invited by IFS to submit a product specification for the assessment. During the assessment, the main product and data integrity risks concerning the critical raw materials and the products produced by the company, are checked. Those parameters will be reported, next to the general checklist.

1.3.1 Why can a manufacturer not directly select and give the order for an IFS PIA to an IFS-approved Assessment sevice provider?

IFS takes responsibility for the integrity of the whole program and for the management of the process.

1.3.2 Our company has very different products for different retailers; will they get several assessments?

The scope of an IFS PIA is always the product integrity system at location X of company A. If the location covers several product ranges, these are all included in the assessment. IFS PIA aims at preventing duplication of (2nd party) assessments.

1.4 Why not issue a list of approved CBs and assessors? How will the CB be selected?

This is part of the responsibility IFS takes for the integrity of the whole program. IFS will select a CB that has assessors that are IFS PIA trained by IFS. The CB will select the assessor to perform the assessment.

1.5 Why is the chapter on traceability that extensive, since the subject is covered by EU legislation?

Legislation covers one step back and one step forward, the IFS PIA requires more (risk-based).

1.6 Is it possible for a company to use the system as self-evaluation without informing the customers?

The IFS PIA assessment report will be published as is done for the other IFS Standards. The checklist of the IFS PIA can be used for self-assessments in preparation for the onsite assessment. The onsite assessment will be performed by an IFS trained and approved assessor.

1.7 If the company places an order with IFS, will IFS issue the invoice or the auditing company/assessor?

IFS will get the order and will issue the invoice for the IFS PIA assessment.

1.8 Is there a plan/option to integrate this as module to IFS certification in future versions?

The IFS Board decided to start the IFS PIA as a stand-alone assessment because a combined food safety & product integrity assessment would overwhelm small and medium size companies. In addition, the focus of the combined audit/assessment would not be clear and the total audit duration too long. Assessors have emphasized from the experience gained with the IFS PIA pilot assessment during 2018 that the focus and mindset of the food safety and product integrity assessments are fundamentally different. It would be too hard to separate integrity thinking from food safety thinking in one audit; the correct focus will be lost.

1.9 Where are the limits for a participating company with regard to e.g. supply chain transparency?

This is described in the standard per requirement/chapter and is risk-based.

2 CUSTOMERS PRODUCT & PRODUCT SPECIFICATION

2.1 On which basis are the customers informed?

The company who orders the IFS PIA has to give the names of the retailers to whom he delivers private label products. These retailers will be informed by IFS that an IFS PIA will be performed at this site and that they have the opportunity to provide a product specification and attention points for the assessment to IFS.

2.2 How is the confidentiality of the product specifications guaranteed?

IFS handles the full audit reports with care and guarantees the confidentiality of each audit report since the beginning of IFS in 2003. The same approach will IFS follow with regard to the product specifications. Also, IFS will handle all information according to the new EU General Data Protection Regulation (GDPR).

2.3 Which criteria will be used to choose the product(s) for the IFS PIA assessment (and how will it be handled in case there are different supply chains / chain of custody)?

The product specifications that are submitted by the retailers as input for the assessment will be analysed by the assessor during the preparation and summarized into a list of parameters to be checked, which will cover criteria like quid, mass balance, origin of ingredients, claims/chain of custody, supplier management, etc.
The preparation of an IFS PIA and the parameters to report on will cover the most vulnerable/critical raw materials and the main process/product claims, e.g., less than x % sugar, allergen-free, organic, Beter Leven.

2.4 Role of the retailers: how are they involved in the process?

IFS PIA aims to minimize retailers doing their own product integrity audits, in order to avoid duplication and high cost for all parties involved. Therefore, retailers who are registered at IFS are invited to submit a product specification for the preparation of the assessment and report, allowing the assessor to draw up a relevant list of parameters. Also, each retailer can submit points of attention. These points of attention will be checked during the assessment and can be product specific, or relating to e.g. complaints, test results, etc.

3 ASSESSMENT PREPARATION

3.1 Which competences are required to do the risk profile and preparation of audit?

The risk profiles are prepared by IFS, based on the information the company has provided on products and critical raw materials. The risk profiles are provided to the assessor for the preparation of the assessment.

In order to do the intended preparation, the assessor has the following competencies:

- Knowledge of sector specific integrity risks, such as fraud cases in the past and what are the most valuable raw materials
- Analytical skills and a ‘think like a criminal’ mindset
- Be able to translate a product specification into an effective audit trail.

3.2 Based on which databases and information sources will the assessment preparation be done?

For creating the risk profiles, IFS uses only legitimate sources of information and databases. IFS pays attention to technical correctness and use. The assessor will do additional internet research on the company, to find out about possible issues (e.g. financial, legal, reputational) in the past or present.

4 ASSESSOR

4.1 Can the assessors be IFS food auditors? (it is mentioned that they should have a different profile)

Yes. In principle the IFS PIA can be done by an IFS Food auditor who is also qualified for IFS PIA. Also other auditors, e.g. Chain of Custody auditors can become an IFS PIA assessor. In any case, the IFS PIA assessor has to have followed a lead auditor training and performed 10 third-party audits as lead auditor. Next to this (s)he has to have followed the IFS PIA assessor training, since specific audit skills and techniques are required, such as strong (non-verbal) communication skills and sense of organizational culture, analytical skills for a.o. product balance verification, being able to challenge senior management and a ‘think like a criminal’ attitude.

IFS PIA assessor candidates go through an assessment before they are accepted for the IFS PIA training. The assessment will be an online test with questions, probably to be combined with a call. It will focus on the necessary personal characteristics and the attitude as mentioned for the training, a.o. having a suspicious attitude, being detailed and analytical, ability to think out of the box.

4.2 What will be the content of the auditor training?

The IFS PIA assessor training will focus on training of skills and further development of the required attitude, with a focus on exercises. The assessment of the trainees will be done by the IFS trainer during the training excercises using a checklist, and after the training, by IFS witness audits (so: no exam).

The training will be developed in 2018 and the practical management of the training program will be worked out as a next step (e.g. assignment of trainers in various countries, calibration program).

4.3 What does the professional conclusion of the assessor mean?

An important element in the assessment report will be the “professional conclusion of the assessor”, which is actually an overall evaluation by the assessor of the whole assessment process: before, during and after the assessment (so including the improvement plan).

The professional conclusion of the assessor consists of 4 criteria, for which the assessor has to give thorough motivations.

- The management and key personnel showed a sincere drive to ensure product integrity (do they want it).
- The management and key personnel showed an appropriate risk awareness to support an effective product integrity system (are they able).
- The management and key personnel demonstrated that they are in control and that the integrity management system is effective (do they do it).
- In relation to the best practices the company showed strong – and/ or improvement points resulting into a bonus/ malus.

Per criterion the scoring is A, B, or C. The 4th question about best/poor practices will determine the possible bonus (A) or malus (C) impact on the total scoring. This part is valued highly by the retailers as an addition to the checklist in the assessment of a company’s integrity.

The Working Group underlines the importance of the assessor’s specific competence to stimulate the discussion between the company and the retailer.

This part of the report should not be a mere summary of the assessment based on the checklist. In the communication with the auditee and in the assessor training program, the professional conclusion will get extra attention.

4.4 There are some food safety related requirements in the checklist – does this mean that the assessor has to have a food safety background/experience?

No, the requirements referred to (ref: chapter 6, Nonconforming products) are related to product integrity. In some cases integrity can be food safety related. The assessors will be selected on their relevant experience (which can also be e.g. chain of custody audits) and will be trained on the requirements of the IFS PIA and the specific skills necessary to do the IFS PIA.

5 ASSESSMENT

5.1 How to deal with a situation that an IFS Food audit takes place weeks after the IFS PIA and something is found concerning product integrity?

In principle and if practically possible, the IFS PIA should not be done by the same CB that performs the IFS Food on a company. We will have to see how this will work out/be possible to implement in practice in view of availability of assessors and CB's.

5.2 Which criteria will be used for the assessment duration?

The standard assessment duration is 2 days. 2 Days are also the maximum duration of an IFS PIA.

It has become clear from the experience with test and pilot audits during 2017/2018 that an IFS PIA takes no less than 2 days, since not only the comprehensive IFS PIA checklist will have to be verified but also the parameters resulting from the input of risk profiles and retailers' product specifications, including detailed product trail(s). There is no way to calculate time like for IFS Food.

Also for IFS PIA assessments at trader/broker locations, the 2 days duration will be planned since until now there is no reason to expect that such assessments will take less time (often, the range of products and raw materials is broader than for producers).

5.3 What happens in case severe deviations are noted for an IFS certified company (report via IP?)

If during an IFS PIA a real food fraud topic or any other specific risk is discovered, it is planned to give a KO and the manufacturer cannot pass successfully the assessment and it should be reported to the Integrity Program. If during an IFS PIA a food safety issue is observed, it should also be reported to the IP to involve the CB that has issued the certificate. That CB has the responsibility to follow up on this non-conformity.

5.4 How is the scoring planned?

The scoring per criterium will use the same structure as for other IFS standards: A/B/C/D and the possibility of a Major (in case of an unintentional product integrity issue) or KO (in case of an intentional product integrity issue, i.e. fraud). Additionally, the professional conclusion of the assessor can result in a bonus/malus on the final score in case of best or poor practices.

The final score will be scaled as higher/medium/foundation/lower level, which corresponds with an audit frequency of resp. 3/2/1/0,5 year. The scaling will not be used during the 2018 assessments, since it has to be evaluated from the experience gained what scoring should correspond to what level. Also, it is still under discussion whether the audit frequency should be different (less than 3 years for a higher level).

6 REPORTING

6.1 Who owns the report?

The company who pays for the IFS PIA will be the owner of the report.

6.2 How will the retailers receive feedback on their attention points?

In the assessment report there will be a list of the attention points as submitted before the assessment by the retailer clients, in an anonymized format. The assessor will provide feedback on each of those attention points, in the assessment report. The retailers will benefit by getting feedback on their individual attention point and by seeing the feedback on attention points from other retailers (in an anonymized format).

As with the other IFS standards, notification will be sent out to the retailers in case of a Major or KO.

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