

Final Unannounced Recertification Audit Protocol  
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#### 4.5 Unannounced Re-certification Audit

Within three (3) certification cycles the certification body shall conduct one (1) unannounced re-certification audit of the supplier. The unannounced audit shall occur in the supplier's facility within the sixty (60) day re-certification window (i.e., the anniversary date of the initial certification audit +/- thirty (30) days). Currently certified SQF suppliers shall be required to undertake one (1) unannounced audit within the three (3) year certification cycle.

- i. The supplier's certification cycle begins with the initial certification audit date. Unannounced re-certification audits shall occur once in every three (3) certification cycles.
- ii. Unannounced audits shall not be conducted on the initial certification audit or on a surveillance audit.
- iii. If a supplier changes certification bodies, the supplier's unannounced re-certification audit schedule shall not change.
- iv. The unannounced re-certification audit shall follow the protocol under the SQF Code, Part A, section 4.3 and 4.4.
- v. Multi-site suppliers are exempted from unannounced audits.
- vi. The date of the unannounced audit shall be determined by the certification body within the 60 day re-certification audit window.
- vii. The unannounced audit year shall be determined between the supplier and certification body.
- viii. A defined blackout period shall be established by negotiation between the supplier and their certification body that prevents the unannounced re-certification audit from occurring out of season or when the facility is not operating for legitimate operational reasons.
- ix. Immediate suspension of the supplier certificate shall occur in facilities that refuse entry to the auditor for an unannounced audit.

#### FAQs:

1. Has the protocol changed since it was posted in February?  
**The protocol now includes the ability for the certification body (CB) and supplier to identify the unannounced audit year, additionally there are provisions for the CB to prevent the unannounced audit year from being scheduled for the first re-certification audit.**
2. How will facilities be chosen for an unannounced re-certification audit?  
**Together, the CB and supplier will determine the unannounced audit year with any current SQF certified facility being eligible for an unannounced audit. Multi-site operations however are exempt from the unannounced audit requirement and the unannounced audit shall not be scheduled for the initial certification audit, surveillance audit and first re-certification audit. However, any other re-certification audit within the three year cycle may be selected by the certification body as the unannounced audit.**

3. Why are multi-sites exempt?

Module 16 of the SQF Code defines a multi-site program as one in which multiple growing sites feed into a central site or pack house. Large organizations with many associated sites do not qualify as a multi-site within the SQF program. The process of certifying a multi-site program is complex, thus making the unannounced audit program challenging to execute, therefore it is excluded at this time.

4. What if the supplier is not in operation on the day the auditor shows up for the unannounced audit?

The unannounced recertification audit protocol allows for the supplier to pre-establish with their certification body "blackout dates" or any days in which the supplier is not operating during the recertification audit window. This blackout period is based on production and seasonal schedules and the supplier should expect the unannounced audit to commence on any day within the sixty (60) day re-certification window, except for the agreed blackout dates. If production schedules change, it will be the responsibility of the supplier to communicate any new blackout dates to the CB during the pre-determined unannounced audit year.

5. Is there a limit to the number of blackout dates that a facility can identify?

There is no limit to the number of blackout dates for each facility, however, the facility may need to provide evidence that the identified blackout period was justified (e.g. production schedules, growing periods, etc.).

6. Does the facility have the option to decline the unannounced audit?

No. Because the unannounced audit is a valid, re-certification audit the facility will not have the option to decline an unannounced audit.

7. What are the ramifications for a facility that refuses the unannounced audit?

Refusal of the unannounced audit will result in immediate suspension of the certificate. The certificate will be reinstated upon successful passing of an audit.

8. After a site has undergone an unannounced audit, when does the unannounced audit period "reset?"

The site will receive one unannounced audit with three (3) audit cycles. Therefore, the unannounced audit period resets after the completion of three (3) certification cycles. For example, if 2014 is the first year of the supplier's audit cycle, then one (1) unannounced audit will be conducted within the time period between 2014 and 2017. The next time period in which an unannounced audit would occur for this site is from 2018-2021.

9. Suppliers may experience limited staff resources on the day of an unannounced audit for such activities as escorting the auditor, pulling documents for review, etc., potentially causing substantial delays and impacting the audit duration. What are SQFI's expectations in this situation?

SQFI, the certification bodies and auditors understand that the audit duration may be impacted during an unannounced audit. However in discussing this with the CBs and auditors, there was no significant concern for substantial delays. Because of the expectation for the site to be "audit ready" at all times and the protocol allowing for the supplier's unannounced audit year to be pre-determined and the re-certification window to remain the same (sixty (60) days, thirty (30)

days on either side of their anniversary date) this should provide sufficient time to prepare for an audit, announced or unannounced.

10. Some suppliers may store records off-site and may need extra time to access and present those for review. How will these situations be address during the unannounced audit?

The SQF Code indicates in element 2.2.2.3 that documents are to be readily accessible and retrievable. The required documents must be available and accessible during the unannounced audit.

11. If a supplier had their first certification audit in November 2012 and November 2014 will be their third cycle, does this audit need to be unannounced or is the unannounced audit something that is going into effect starting with 2014 and moving forward.

The unannounced audit requirement will begin with the implementation of the SQF Code, edition 7.2 on July 3, 2014. That means that the first three certification cycles would be 2014 - 2017 regardless of their initial certification audit date.

12. Will SQF provide training and other information to their stakeholders on unannounced audits?

SQFI has discussed the protocol at length with their Technical Advisory Council and Certification Body committees and has solicited feedback through a public comment period and have taken into account their advice regarding particular scenarios and situations. This advice has been included in the final protocol that is included in part A, section 4.5, edition 7.2 of the SQF Code. Additional training through webinars and interpretation guidelines will be provided for auditors and suppliers on the expectations of the unannounced audit. The SQF stakeholders will be informed via email or the SQF website of any updates or training opportunities.