

Guideline for Seafood Processing Standard Facilities (SPS) Section 2.9 Outsourcing & Specifications – Processes and Services

1.0 Purpose

This document provides guidance for Facilities and Certification Body (CB) Auditors to the Global Seafood Alliance Seafood Processing Standard (SPS) 5.1., clauses 2.91, 2.92, and 2.93 **Outsourcing & Specifications – Processes and Services**. This guidance is specific for processing facilities seeking SPS certification or recertification, herein referred to as the Primary Facility, that engage in outsourcing to complete a portion of their production process.

2.0 Guidance

2.9 Outsourcing & Specifications – Processes and Services

2.9.1 The facility shall exercise proper control over any entity that is used to outsource any processes that may have an impact on food safety, legality, quality, traceability, and social responsibility. (See Annex 3 regarding traceability for BAP star status).

Guidance


Outsourcing as defined by GSA is when a facility transfers a temporary part of the production process, including storage, primary packaging, labelling, or product transformation, to an alternate site (hereby referred to as the outsourcing facility), to perform intermediate production processes on material supplied by the primary facility. The outsourcing facility could be under the same or different ownership as the primary facility; however, the control of the process and final product must be maintained at the primary facility.

Buildings that are adjacent to, or within the same boundary of, the primary facility are not considered an outsourcing facility and shall be included in the certification audit.

After any intermediate outsourced production process has been completed, product must be returned to the primary site for final processing steps, final inspection, and distribution. The primary facility shall have documented signed contracts in place with the outsourcing facility, even if under the same ownership, that define processing requirements and product specifications.

2.9.1 Clause Interpretation:

- The facility shall exercise proper control over any service provider that is used to outsource any processing activity. The controls required are outlined in clauses 2.9.2 to 2.9.9.
- NOTE: This refers to outsourcing activities OTHER THAN peeling or de-heading shrimp. (See 2.9.5)
- Examples of commonly outsourced processing services include, but are not limited to:
 - Stunning, slaughter, bleeding, eviscerating, freezing, filleting
 - Packing, repacking,
 - Labelling (especially for canned products)
- What to look for:
 - Consider auditing this clause after all clauses in section 2.9 have been assessed.
 - If proper control measures are not adequate, indicate the area of impact (food safety, legality, traceability, and/or social responsibility).

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2.9.2 The facility shall demonstrate control over any outsourced processing service. Control measures shall include but are not limited to audits to full scope of SPS by the facility or third-party certification to SPS, laboratory testing of outsourced products, and traceability of outsourced products.

Guidance:

- Control measures shall include either of the following:
 1. A valid and current certification of the facility performing the outsourcing activity against GSA Seafood Processing Standard (current version).
 2. An on-site audit of the facility where the outsourced activity is being performed by a competent auditor (which can be facility personnel or an external contractor) conducted annually to include the full scope of the current version of Seafood Processing Standard and all relevant Annexes. Internal and contracted auditors shall be trained and competent to conduct SPS audits. The facility shall have a provision against internal auditors auditing their own departments or functions.


Evidence to the above includes either a valid GSA SPS certificate or an internal or second-party SPS audit report conducted within the last twelve months.

- Laboratory testing of outsourced products for microbiological risks as defined in SPS 5.1 Annex 4 Table II, and traceability of outsourced products, remains the responsibility of the primary facility.

2.9.3 The control measures over such outsourced processes shall be identified, documented, and monitored to ensure compliance with the full scope of the SPS standard.

Guidance:

- During the SPS certification audit, the CB Auditor shall verify the following:
 - Qualifications of the auditor conducting the internal or second-party SPS audit.
 - That the internal or second-party SPS audit has been properly conducted by the Primary Facility on the outsourced processor.
 - That all nonconformances identified in the audit have been satisfactorily closed in the same timeframes allowed for annual CB recertification audits, and in all cases have been closed before the external CB audit.
- If the CB auditor observes or obtains evidence of a major or critical NC where the control of the outsourced processor has not been maintained by the primary facility per 2.91, 2.92, or 2.93, the auditor shall contact their CB for further instructions. In such instances, the CB shall notify GSA of the NC observed and GSA shall determine next course of action. One next course of action may be a required 3rd party external audit by a/the CB auditor at the outsource location. In such instances the burden of cost of the external audit shall be the responsibility of the primary processor.

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Further Guidance for Slaughter Facilities

Slaughter facility outsourcing under this guidance applies only at the seafood processing plant control level. Ownership of product is a means to characterize control responsibility.

If fish are slaughtered at an intermediary facility (between farm and plant) the following decision process shall be applied:

- a) Product owned by primary plant at time of slaughter – The slaughter facility is an outsource process of the primary plant and applies under this guidance.
- b) Product owned by farm at time of slaughter – Control is maintained at farm level; control through the slaughter facility would need to be maintained and verified through the farm's BAP certification.
- c) Product owned by slaughter facility – Control is maintained by the slaughter facility. For 2,3, and 4-star product, the slaughter facility would be considered a primary processor and require BAP certification (including testing). Otherwise, a primary processing plant downstream of the slaughter facility would be only 1-star capable for that product.
- d) Farm, slaughter facility, and processing plant all under same ownership – Control of product shall be determined based on whether management of the slaughter facility is maintained by the farm or by the processing plant. If the slaughter facility is under different management than either the farm or the processing plant, control shall default to the processing plant and apply under this guidance.

Note: An alternative to a) and b) is for the slaughter facility to become SPS certified.

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