



# **Unannounced Audit Policy for SPS Audits**


**Issue 3.0**  
**24-October-2024**

## 1. Scope and Purpose

- 1.1 Per GFSI benchmark requirements, facilities certifying under the GSA Seafood Processing Standard (SPS) must undergo one unannounced audit every three years. These unannounced audits shall be planned and conducted by the CB. The criteria detailed below applies for all unannounced audits.

## 2. Timing and Pre-requisites of Unannounced Audits

- 2.1 Initial audits of new facilities shall not be unannounced.
- 2.2 Initial unannounced audit years shall be confirmed during the recertification application process and requirements shall be agreed upon as stated herein.
  - 2.2.1 Starting June 1, 2023, all recertifying SPS facilities that have not had an unannounced audit in the past 3 years shall be mandated to have an unannounced audit as per Global Food Safety Initiative (GFSI) benchmark. Failure to meet this requirement may result in a suspension from the Certification Program.
  - 2.2.2 Starting October 1, 2022, all recertifying SPS facilities must submit completed applications and audit fee payments to GSA at least 6 months prior to their certificate expiration date. Applications and payments submitted less than 6 months of expiration dates may result in a lapse in certification.
- 2.3 Once an initial unannounced year is determined, subsequent unannounced audits must be conducted at least once every three-year period.
- 2.4 Dates of unannounced audits during corresponding audit cycles shall be determined by the assigned CB.
- 2.5 During the unannounced audit cycle the CB shall give notice to the facility that an unannounced audit is pending. Said notification shall:
  - 2.5.1 be made by the CB at least 4.5 months (135 calendar days) prior to the certificate expiration date.
  - 2.5.2 initiate finalization of any agreements and communications required between the CB and the facility to conduct the audit.
  - 2.5.3 specify a 60-day window in which the unannounced audit shall take place.
  - 2.5.4 communicate to the facility that adequate personnel must be available, during normal business operating hours, within the 60-day window stipulated for the audit.
  - 2.5.5 general expectations for the first date of the audit plan (see 4.3).
- 2.6 Once the communication in 2.5 is made by the CB to the facility, the facility may elect to request a black-out period of two weeks (14 calendar days) within the 60-day window to accommodate shut-down periods, non-production days, or annual maintenance that the facility might have to undertake. Such request by the facility should be made within 10 calendar days of the notice by the CB (2.5). Such black-out period must be agreed upon by the CB and the facility.

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- 2.7 **Communications occurring between the CB and the facility after those completed in 2.5-2.6 shall be restricted from containing any information related to the unannounced audit dates.**
- 2.8 Unannounced audits must not take place on weekends (or holy/religious days) or official holidays in the region where the facility is located.
- 2.9 For seasonal facilities, the 60-day window may be reduced at the discretion of the CB to accommodate seasonal variations

### 3. Unannounced Audit Operational Criteria

- 3.1 All unannounced audits shall be conducted on-site. Remote audits do not qualify for unannounced audits.
- 3.2 Unannounced audits shall be conducted to the standard version to which the facility applied to.
- 3.3 If the facility denies the CB Auditor access to the site without reasonable cause, audit fees paid by the facility shall be forfeited and the facility's certificate may be suspended/withdrawn at the discretion of the CB. The CB must immediately inform GSA.
- 3.4 If the facility claims they cannot accept the unannounced audit when the auditor arrives at the facility due to unforeseen circumstances beyond their control, the following applies:
  - 3.4.1 The auditor shall notify the CB for a determination as to whether the audit should continue or be rescheduled.
  - 3.4.2 Rescheduling of the audit makes the unannounced audit invalid and could result in a lapse in certification. Additionally, invalidation of an unannounced audit year could result in suspension from the program (see 2.2.1). Because the CB has incurred expenses in auditor travel and time, audit fees paid by the facility shall be forfeited.
  - 3.4.3 The CB shall inform GSA of any such outcome.
- 3.5 Auditors shall be trained by CBs in unannounced audit protocols.
- 3.6 All KPIs and timelines for report submission, NC closures, technical reviews and certification decisions are similar to that of announced audits.
- 3.7 "Certification" and "No-certification" decision by the CB also shall be determined in a similar manner as that of announced audits.

### 4. Unannounced Audit Process


- 4.1 Duration and process of unannounced audits shall be similar to that of announced audits as specified in the CB Requirements document.
- 4.2 Unannounced audits shall start immediately upon the arrival of the CB auditor at the facility without delay. Delays may be grounds for cancellation of the unannounced audit and must be communicated by the auditors to their CB immediately.
- 4.3 A preliminary visual walk-through shall be conducted as soon as the auditor arrives on site. This is to observe if there are any ongoing inappropriate practices with regards to food safety/GMPs/SSOPs/social criteria of the SPS when the auditor first arrives.

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- 4.4 The opening meeting shall take place after the initial walk-through.
- 4.5 A thorough facility tour/ inspection by the CB auditor shall continue after the opening meeting without undue delay. Day 1 of facility inspection shall include, at a minimum, the following:
- physical infrastructure with associated HACCP/food safety plans, GMPs, and SSOPs
  - selection of lots for traceability tests
  - worker interviews
  - selection of product samples to be drawn for testing
- 4.6 Issue of NCs, corrective action review, and non-conformity closures are handled similar to that of an announced audit as in CB Requirements document.
- 4.7 If there are extenuating circumstances, the CB shall contact Program Integrity ([programintegrity@globalseafood.org](mailto:programintegrity@globalseafood.org)), with CB Dept ([CBDept@globalseafood.org](mailto:CBDept@globalseafood.org)) and Certification ([certification@globalseafood.org](mailto:certification@globalseafood.org)) on copy, for guidance.

## 5. Effluent Sampling (Annex 2)

- 5.1 During an unannounced audit, the cases below shall be assessed to satisfy requirements of SPS Annex 2. For instances where sampling shall be conducted by a designated 3<sup>rd</sup> party (5.1.2, 5.1.3), facilities should contact the 3<sup>rd</sup> party as soon as they are notified of the 60-day audit window to minimize any delays due to sampling /laboratory analysis capacity.
- 5.1.1 **Case 1) The facility collects its own samples under auditor supervision.**  
The auditor supervises the sampling process and verifies that samples are taken from the correct locations using accepted sample collection methods. SPS clauses A2 2.6.1, A2 2.6.2 and A2 2.6.3 apply.
- 5.1.2 **Case 2) The facility employs a designated 3<sup>rd</sup> party sampling team (e.g. laboratory personnel), and sampling and testing is able to be conducted under short notice during the audit period.**  
On day-1 of the audit, the facility shall contact the lab to see if the sampling could be conducted within the time frame of the audit. Under case 2) testing is able to be conducted under short notice. The auditor supervises the sampling process and verifies that samples are taken from the correct locations using accepted sample collection methods. SPS clauses A2 2.6.1, A2 2.6.2 and A2 2.6.3 apply
- 5.1.3 **Case 3) The facility employs a designated 3<sup>rd</sup> party sampling team, and sampling and testing is not able to be conducted under short notice during the audit period.**  
On day-1 of the audit, the facility shall contact the lab to see if the sampling could be conducted within the time frame of the audit. Under case 3) testing is not able to be conducted under short notice. During the audit, the facility shall verify with the auditor the date that the sampling has been scheduled. Additionally, the facility shall provide to the auditor a detailed sampling plan containing at least the following:
- a. Contact information for the third-party lab
  - b. The date of the planned sampling by the third-party lab
  - c. The correct sampling locations

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- d. The accepted sample collection methods


Under 5.1.3, the sampling plan shall be applied to SPS clause A2 2.6.1. Clauses A2 2.6.2 and A2 6.2.3 shall be recorded by the auditor as Not Applicable. Failure of the facility to ensure that the CB receives test results in a timely manner may result in lapse in certification.

## 6. Product Testing (Annex 4)

- 6.1 Facilities should contact 3rd party laboratories as soon as they are notified of the 60-day audit window to minimize any delays due to laboratory analysis capacity.
- 6.2 Facilities shall be notified that the auditor will be supervising the collection of sampling on day-1 of the unannounced audit.
- 6.3 Sampling shall be conducted on species available during the audit. If species within the certification scope are not available during the unannounced audit, the auditor will select samples that will provide the verification intent contained within Annex 4 testing tables II, III, and IV as applicable.
- 6.4 **In the event sampling is delayed due to 3rd party sampling and laboratory testing schedule conflicts or constraints, samples shall remain under control of the facilities quality team (QC hold), under secure storage and delivered to laboratory within 10 business days of the unannounced audit.**

## 7. Audit Reports and Certification

- 7.1 Audit reports and certificates issued by the CB following a successful unannounced audit must clearly identify that the audit was “Unannounced” in addition to specifications in the CB Requirements document
- 7.2 Limited scope, supplemental, or re-audits necessitated based on results of unannounced audits shall be announced unless otherwise specified by GSA.

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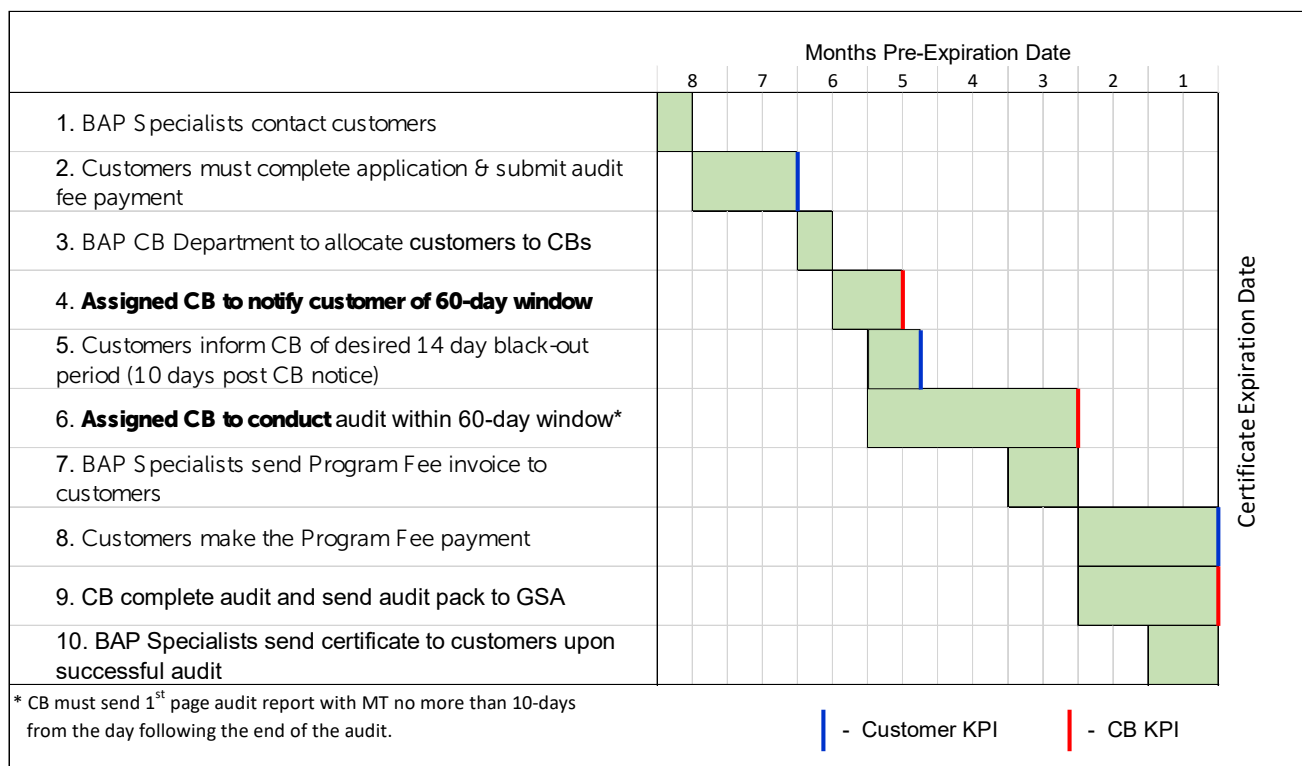


Figure 1. Unannounced Audit Process Gantt chart