



TRANSITION POLICY

(CXC 1-1969, Rev. 2020 – HACCP / TCVN 5603:2023)

Document Title : G-04
 Revision No. : 1
 Effective Date : 06.04.2023
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1 TRANSITION PHILOSOPHY

BVQA considers CXC 1-1969, Rev. 2020 – HACCP / TCVN 5603:2023 (new standards) to be a significant development primarily due to changes in structure, and the introduction of additional concepts and themes. It is our goal to ensure that we perform value added audits.

Below is a summary of some major changes against 2003 revision:

1. CHANGES IN STANDARD STRUCTURE

The standard has been restructured with 2 main parts: Good Practice Hygiene and HACCP principles. The structure of Good Hygiene Practice has been rearranged, adding a general principle.

2. GENERAL PRINCIPLES

The general principles section added to better clarify the requirements for controlling food safety hazards must be based on science, control measures must be validated scientifically.

The food safety control system must be periodically verified, reviewed and taken corrective actions as necessary.

Appropriate communication about the food and food process to be maintained among all relevant parties to ensure food safety and suitability across the entire food chain.

3. COMMITMENT OF MANAGEMENT AND FOOD SAFETY CULTURE


To ensure the success of the food safety management system, the commitment of leaders in establishing and maintaining a food safety culture in the organization has been added in HACCP Codex 2020/TCVN 5603:2023.

- ✓ Responsibilities and authorities must be communicated inside the organization
- ✓ Communication
- ✓ Resource supply
- ✓ Training to staff
- ✓ Legal requirements compliance
- ✓ Continuously improvement

4. CONTROL OF ALLERGENS

HACCP Codex 2020/TCVN 5603:2023 adds to the hazard and requires control of allergens in addition to physical, chemical, and biological hazards. Requirements on allergens management are referred to “Code of Practice on Food Allergen Management for Food Business Operators (CXC 80-2020)”.

- ✓ Identification of allergens in raw materials

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- ✓ Cross-contamination control (storage, cleaning, swab test etc.)
- ✓ Allergens awareness training
- ✓ Labelling and provide allergen information to customers and consumers

5. PREPARATION STEPS AND 7 HACCP PRINCIPLES

- ✓ 5 steps of preparation for HACCP are described in more detail. For example, the flow diagram requires more detail than HACCP Codex 2003.
- ✓ Significant hazard definition and CCP identification only apply to significant hazards.
- ✓ The decision tree diagram is no longer the only option when defining CCP, can use a different approach to identify CCP.

2 GENERAL TRANSITION GUIDELINES

1. All current existing certificates to CAC/RCP 1-1969, Rev. 2003 – HACCP / TCVN 5603:2008 (old standards) will expire three years after release and publication of TCVN 5603:2023 (new standards). The expiry date of CAC/RCP 1-1969, Rev. 2003 – HACCP / TCVN 5603:2008 will be 06th April 2026.
2. If a client's old standards certificate expires before they are able to fully transit to the CXC 1-1969, Rev. 2020 – HACCP / TCVN 5603:2023 standard, they may be re-registered to the old standards (subject to a cut-off period to allow for subsequent transition). The expiration date of this re-registered certificate will be within the three year anniversary of the release of CXC 1-1969, Rev. 2020 – HACCP / TCVN 5603:2023.
3. A new certificate to new standards will be issued when it can be satisfactorily shown that a client has fully met the requirements of the new standard. As is the current practice, all major non-conformities must be effectively closed out and corrective actions plan for any minor non-conformances must be received and accepted by BVQA, prior to issuance of a certificate.
4. Clients must undertake a Management Review and Internal Audit to the new requirements of CXC 1-1969, Rev. 2020 – HACCP / TCVN 5603:2023, as this exercise serves to ensure that all requirements have been addressed in the management system. Clients must also have reviewed the outcome of their gap analysis with top management. This would ideally be through management review but other mechanisms are acceptable.

3 TRANSITION OPTIONS

Organizations will have 3 years to transition their MS to become compliant to the new standard. Based on this timeframe **BVQA** has developed two (2) transition options:

OPTION 1/Lựa chọn 1: Annual Surveillance or Recertification Transition - Recommended Option.

The audit duration will be equal to that allocated for recertification audit to allow the completion of a full and effective transition assessment against the new standard requirements.

OPTION 2/Lựa chọn 2: Special/Any-time Visit Transition.

As an exception - Transitions may be conducted as a special visit at the request of the client. Under these circumstances the duration shall equate to the surveillance audit.

4 CERTIFICATION VALID UNTIL DATE

If successful, BVQA will issue a new certificate with the valid until date (VUD):

- At a surveillance or special audit: this will reflect the previous certificate.
- At a re-certification audit: this will reset the three year certification cycle.

- It is likely that a number of certificates will have a valid until date that has been restricted to less than 3 years by the end of transition period. In this circumstance, when the client successfully transits their system, the CXC 1-1969, Rev. 2020 – HACCP / TCVN 5603:2023 certificate will re-instate the remaining cycle duration. This will return the client to their previous 3 yearly cycle.

5 CUSTOMER TRANSITION COMMUNICATION

BVQA will inform clients on new standards publications and transition processes by Notification letters or via website www.bvqa.org.

6 AUDITS

6.1 PRIOR TO A TRANSITION AUDIT

BVQA will contact the client approximately 30 days prior to the audit (by confirmation / reminder letter) and ensure that the client is ready for the transition activity.

Organizations that cannot confirm preparedness shall be encouraged to inform **BVQA** as soon as possible to discuss further actions.

6.2 PRIOR TO A SCHEDULED NON-TRANSITION AUDIT

BVQA will contact the client approximately 30 days prior to the audit and ensure that the client understands that the audit will NOT be a transition event.

If they want to transit at the audit, please inform **BVQA** as soon as possible – do not wait until the **BVQA** reminder arrives, as the duration of the audit may need to be revised.

6.3 UNSUCCESSFUL TRANSITION AUDITS

Whilst BVQA makes every effort to inform clients and verify the preparedness of clients prior to their audit taking place, there may be circumstances where an auditor attends a transition visit where the client does not meet the criteria of CXC 1-1969, Rev. 2020 – HACCP / TCVN 5603:2023 by a significant margin (where a re-visit would normally be required).

The auditor will use best judgement as to the way to proceed and has two primary courses of action;

- **Option 1** - Raise major NC against CXC 1-1969, Rev. 2020 – HACCP / TCVN 5603:2023 and require the client to be subject to a re-visit.
- **Option 2** - Undertake the audit against old standards and utilize the time provided for transition to undertake a pre-assessment for the client against CXC 1-1969, Rev. 2020 – HACCP / TCVN 5603:2023.
 - The auditor shall not leave the client location earlier and cancel the additional duration for transition.
 - The auditor shall contact the BVQA Office for the audit type to be changed on SAM and the report shall be submitted as old standards.

7 MULTI-SITES

For clients that are registered with a multisite certification the transition approach will be similar, however due to the potential for additional complexity the process will be coordinated differently.

Where all requirements of the CXC 1-1969, Rev. 2020 – HACCP / TCVN 5603:2023 standard can be audited for all scope elements from the client management centre, the transition may be approved for the whole multisite on the basis of a transition audit to the management centre only.

Where certain requirements can only be audited from (a) site location(s) then (a) separate transition audit(s) will be required to be conducted to assess these requirements. The transition audit duration for an individual site shall be that of a standard surveillance audit to that site as per the current multisite program.

The transition shall only be processed once all required audits have been satisfactorily completed.

During the transition audit of a multisite client, the assessor should ensure that changes to the client's management system to address the new requirements of the CXC 1-1969, Rev. 2020 – HACCP / TCVN 5603:2023 standard have taken the site locations into account.

This shall include ensuring that:

- The processes for determining internal and external issues and the needs and expectations of interested parties have considered and taken into account issues and parties relevant to the site locations.
- The determination of risks and opportunities has considered and taken into account risks and opportunities relevant to site locations.
- Planning for any new operational controls have considered and taken into account site-based activities.
- Any new or amended monitoring, measurement, analysis and evaluation processes, such as those necessary for evaluating the performance and effectiveness of the management system, have taken site-based activities into account.
- The planning processes for internal auditing have taken the extent to which sites need to be subjected to internal audit into account and that the internal audit process can demonstrate that the changes made extend to the site locations and are effective.

During the review of a multisite client transition audit report the certification managers and then HoC shall ensure that the assessor has satisfactorily addressed the above.