

Inspection Procedures in Halal Food Certification

Muhammad Ashraf Ali Farooqui*
Nurullah Kurt**

Introduction:

Audit is Systematic, independent and documented process for obtaining audit Evidence and evaluating it objectively to determine the extent to which the audit criteria are fulfilled. It includes adequacy and on-site and follow-up audits. Compliance audit is conducted by means of an independent, impartial and objective audit to ascertain full compliance with the Halal Certificate and Halal Label. Auditors appointed as inspectors, under the Halal Certificate and Halal Label Order, 2005 to determine whether the Halal procedures and requirements and also the related results comply with planned arrangements and whether these arrangements are implemented effectively and are compiled to ensure the foods produced are Halal.

Audit is an activity which is performed by a person which is technically competent in auditing Halal procedures and requirements in a particular food processing technology or field, formally appointed by the Halal certification body or Halal food authority. Halal auditor check compliance which means the production activities and operations at the place or the place of business meets the Halal Certificate and Halal Label. It is also the responsibility of the auditor to check conformance which means activities are carried out according to the established procedures as laid out in the Halal procedures and requirements.

Non-conformance documented by the auditor which must be satisfactorily addressed or corrected by the applicant is termed as correction action request. All corrective action requests must be closed before a recommendation for the issue of Halal Certificates and Halal Permits can be made. The follow-up activity to obtain evidence that the non-conformance given as corrective action requests are being satisfactorily corrected and implemented and that the Halal procedures and requirements have been maintained. A follow-up audit can be on-site or adequacy / document audit. On receipt of the complete documentation, the auditors conduct an adequacy audit on the Halal Procedures and Halal Pre-requisite programme (Halal PRP) within 1 week after receipt of documents. The lead

*Ph.D Student at Faculty of civilization, niversitiTeknologi Malaysia 81310 Skudai, Johor Bahru, Malaysia.

**Assoc. Prof. Regional Manager (Middle East), Office of International Affairs, Universiti Teknologi Malaysia.

auditor collates comments on the adequacy audit, prepares the adequacy report and submits to the Committee within five (5) working days after receipt of documents. The lead auditor contacts the applicant for the on-site audit appointment within one week after the adequacy audit and sends out a formal on-site audit programme to the applicant and the auditor(s). The auditor(s) prepare audit plan and checklists for the on-site audit. (1)

What is Auditing?:

- Audit is an activity performed by a person who is technically competent.
- Systematic, independent and documented process.

Auditing an examination of records or financial accounts to check their accuracy. (2)

Auditing and al-Quran:

A lot of Qur'anic verses and traditions confirm that human beings will be accounted for their deeds accurately on the Day of Resurrection. All their deeds whether small or big shall be checked and even the most insignificant action shall not be neglected. e.g. God-Almighty said in the Holy Quran:

﴿وَنَضَعُ الْمَوَازِينَ الْقَيْسَطَ لِيَوْمِ الْقِيَامَةِ﴾ (3)

“And we set a just balance for the Day of Resurrection so that no soul is wronged in aught. Though it be of the weight of a grain of mustard seed, We will bring it. And we suffice for reckoners.”

And in another verse Allah says:

﴿إِنْ أَلْفَعَدَّ كَانَ مَنْشُورًا﴾ (4)

"Fulfillment of Covenants and Implementation of Contracts."

"It means: 'On the day of Qiyamah, the way questions shall be asked about the fulfillment or non-fulfillment of obligatory divine injunctions, so it will be with mutual contracts.'" (5)

Audit methodology:

The audit methodology in Halal food is highly complex and sophisticated and comprises of following steps and stages

HALAL Audit Preparation:

Nomination of audit team

The audit team selected shall: Cover fully all the Codes classified on the Contract. Be lead by a Certification Body qualified lead auditor. All team members shall be registered on the auditor database. If a specialist is being used because of the specific nature of the contract, the audit planning activity shall not consider him in the man-days allocated for the audit.

HALAL specific Auditor Requirements:

Qualifications for Halal Certification technical auditors as below.

Shariah Advisor Qualification	Technical Auditor Qualification
<ul style="list-style-type: none"> • Minimum qualification is Dars-e-Nizami. (شهادة العالمية فى العلوم الشرعية الإسلامية) Higher education like M.A. Islamic Studies Or in the discipline of Halal Islamic Standards qualification. • The Shariah Advisor must have an experience of at least 5 years giving religious rulings. • He should have knowledge of or at-least be familiar with the Halal industry. • Relaxation in number of years of experience may be considered in case of experience as teacher of Islamic Fiqh in a reputable institution, for a period of not less than three years with a proven track record. • Preference for having certificate in TakhassusfilFiqh. (تخصص فى الفقه) • Ensure that confidentiality is maintained for all records and documents related to the audited company. 	<p>Auditors shall:</p> <ul style="list-style-type: none"> a) Maintain independence, confidentiality and integrity; b) Ensure that confidentiality is maintained for all records and documents related to the audited company; c) Keep their knowledge and skills up-to-date; d) Not to retain or reproduce any records and documentation received and generated by the auditee during the course of an audit; e) Not to audit any application of Halal procedures where he / she had been involved as a consultant.(6)

INTEGRITY, HONESTY AND REPUTATION

- Has not been convicted in any criminal offence, involved in any fraud/forgery, financial crime etc.
- Has not been subject to any adverse findings or any settlement in civil/criminal Proceedings particularly with regard to investments, financial/business, misconduct, Fraud, formation or management of a corporate body etc.
- Has not contravened any of the requirements and standards of regulatory system or the Equivalent standards of requirements of other regulatory authorities.

- Has not been involved with a company or firm or other organization that has been refused Registration/ license to carry out trade, business etc.
- Has not been involved with a company/firm whose registration/license has been revoked or cancelled or gone into liquidation.
- Has not been debarred for giving religious rulings by any religious institution/body.

Document review:

Manual review shall be carried out at least four weeks prior the agreed audit date. The team leader might delegate the review to another member of the team, but he remains responsible for the successful implementation of this task. The document shall be controlled; a record of the status of the HALAL manual shall be made. When implementing the review the lead auditor shall ensure that the documentation. Refers to the means by which all the requirements of relevant standard are addressed. Is effectively controlled and appropriately authorized. Formally recognized the existence, and implement as necessary, the pertinent national or international regulatory/statutory requirements applicable to the company and/or the product/service falling within the audit scope. Utilize HALAL Certification Services Standard Forms to record results and any questions which may require answering by the company. State objectively whether the company quality documentation does acknowledge the requirements of the relevant standard. Ensure the company quality documentation acknowledges the specific requirement for the handling of complaints. Ensure the results of the review are communicated to the audit planning activity for onward distribution to the company. This shall reach the audit planning activity in good time to enable the company to be in possession of the results at least two weeks prior to the audit taking place. The review process maybe delegated to another appropriately qualified member of the audit team by the lead auditor. The lead auditor shall be responsible for the successful implementation of the task.(7)

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On site planning visit (if required):

The purpose of the planning visit is to ensure appropriate time and resource has been allocated for the certification audit. The visit shall be implemented by the lead auditor, but in certain circumstances this could also include the addition of other team members. The planning meeting shall identify and provide the lead auditor with adequate information, in order to ensure a meaningful, comprehensive and precise audit ensues.

Those visits are strongly recommended for the following:multi-

sited contracts individual cost centers, product and project driven. Complex organizations with departments distributed over a number of sites. The following explains in more details the objectives of the planning visit:

1. Company structure and organization. To ensure elements planned for audits are representative of the company scope of supply. To understand the geographical and logistical realities of the company and the effect on the subsequent audit
2. Company HALAL food safety management system, Make-up and implementation of the HALAL food management system. Documentary evidence clearly defining levels of authority and responsibility shall be available.

If the company is multi-sited, the lead auditor shall pay particular attention to its method of ascertaining and then demonstrating acceptable spans of control for the control of the HALAL Management System. The relationship between the management representative and local representative shall be ascertained.

The planning visit is not intended to gauge compliance of procedures. It is however important for the lead auditor to recognize and understand the make-up of the systems and ascertain the general principles of the system.

The main objective being to determine the existence of the company's system in meeting the following: Policy towards HALAL management system. To ascertain the various levels of the system, and seeks objectively the subsequent responsibility and authority.

Allocation of time per activity:

The lead auditor shall determine task allocation in relation to the audit team's previously defined technological skills and background to ensure optimum utilization of appropriately trained personnel. The lead auditor shall ensure adequate time is allowed in each area of the audit and at the same time he shall ensure that all the elements of the standard have been planned for audit. In certain circumstances, the lead auditor may not be technically qualified to ascertain all task activity assignments for the audit. Utilization of the relevant audit team members shall be required in order to make such time considerations and activity assignments; this may include the use of specialists.(10)

Special conditions relevant to the company seeking audit:

Special conditions are difficult to pre-define within the body of this document; however the following examples might be typical: specific, regulatory/statutory requirements in force. These will be ascertained at an early stage by the Certification Body team, in order to gauge compliance at the time of the audit. Certification Body when required shall ensure such documents are available to the team in advance of the audit. Security

clearance required by the company for the Certification Body audit team. Audit team qualifications. (may need to be specific). The above are merely examples. The team lead auditor shall obviously be mindful of any special conditions and plan accordingly. The audit plan shall include details of any special conditions or considerations.

Complex organizations present special situations to the audit team:

It is thus important to ensure that these are identified in order to preclude potential audit limitations becoming a reality. For company's involved in the same process over many sites the situation is simple to cover, however the lead auditor is still required to ascertain local (site) activities and then make provisions for macro elements. The macro activities could be centrally controlled and might be elements such as: document control ,contract review production engineering ,purchasing/vendor control ,design functions In complex organizations non-conformities observed during the course of the certification audit may be observed in a department, but could have an influence in other departments or the cause may be in other departments. This possibility must be investigated

Audit plan:

The output of the audit planning process is a detailed plan specifying the essential requirements of the audit. Task and time allocation shall also be specified in the resulting plan. The lead auditor should prepare the plan for the certification audit, or decide on the applicability of standard versions to avoid excess administrative effort.

The documented plan ensures the company is made fully aware of the audit methodology. The audit plan shall ensure a thorough audit of the company's HALAL management system to the specified requirements of the relevant standard, within the agreed time frame. The audit plan shall also ensure that where an off-site activity is to be included in the scope of certification, such as installation or servicing, that these processes are also audited.

The documented plan ensures the company is briefed fully in advance of the audit. This enables the company to ensure relevant personnel are available and departments are notified, hence precluding delays during the certification audit.

The lead auditor should have an overview of the company's operations. This is provided partly by the company's quality manual and the attachments that are requested in the application form.

Audits programmes are designed to make sure that the management responsible for each audited area will be on hand to deal with the audits team. A choice of blank planning forms are also included to facilitate the planning of contracts which have either, a higher or lower man-day content or, require a greater or lesser number of Auditors. All are intended to assist

in compliance with HALAL standards. As a minimum the following details must be given to the client at the audit planning stage, this information can either be on the actual audit plan or accompanying documentation:

The audit objectives and scope

Identification of the individuals having significant direct responsibilities regarding the objectives and scope

Identification of reference documents

Identification of audit team members

The language of the audit

The date and place where the audit is to be conducted

Identification of the organizational units to be audited

The expected time of each major audit activity

The schedule of meetings to be held with auditee management

Confidentiality requirements

Audit report distribution and expected date of issue.(11)

Halal Audit Execution:

Team Allocation:

The audit team shall be appointed and composed of auditors who between them have the totality of the competences identified for the certification of the client. When determining the audit team to be allocated the following issues need to be considered:

- Standard (Product) to be audited
- Product codes i.e. PQC / PEC / SQC
- Auditor status i.e. Lead Auditor / Auditor
- Scope of the audit
- Duration of the audit
- Contractual requirements
- Auditor utilization rates
- Geographical location of the audit site
- Language capabilities of the auditor versus language used by the client.

Initial (Stage 1 & 2) and Recertification Audits

One of the audit team members shall be a qualified Shariah expert.

One of the audit team members shall be a qualified FSMS Auditor.

One of the auditor team shall be designated for the role of Team Leader; this does not have to be the qualified Lead Auditor but can be a Lead Auditor in training.

Surveillance Audits:

All of the audit team members for surveillance audits shall be qualified Auditors.

For one person surveillance audit the auditor may not have to have

demonstrated competence to the lead a team.

Team Leader Responsibilities are:

- To plan the audit, ensuring effective use of the team resources, this includes allocation of the “in-scope auditor to critical processes.
- To represent the audit team in communication with the auditee, this includes conducting the opening and closing meetings
- To organize and direct audit team members
- To provide direction to auditors-in-training. (Where the Team Leader is a Lead Auditor in training, this responsibility is that of a qualified Lead Auditor who is a member of the team)
- To lead the audit team to reach the audit conclusions
- To prevent and resolve conflict
- To prepare and complete the audit report

Communicating to the audit team and the client:

Once team allocation and scheduling are finalized, appropriate information is sent;

- to the client allocating sufficient time for him to object the appointment of an auditor/expert and for Certification Body to change the team
- and to the team leader who is in charge to organize the team in the audit

Stage 1 and Stage 2 - Initial Certification:

Application

Halal Certification Services will require the applicant organization to provide detailed information concerning legal status/entity, raw materials, process lines, FSMS related issues i.e. HACCP studies, the number of shifts and employee numbers in each shift etc. (Formate of a Halal Certification Services application form is attached) Scheduling stage 1 (Initial audit) and stage 2 (Main Audit)

All initial audits are planned in 2 stages that are normally not performed back to back.

Certification Body recommends ‘On Site’ approach for stage 1, when duration for stage 1 and 2 allows , i.e. man days \geq 3 days (medium and large organizations) and minimum will then be one day and then 20-25% of total man days allocated for stage 1 and 2 (2-6 days for 8 days and then follow progression)

Other elements can be considered as well to decide on site or off site stage 1 such as logistics or level of risk of the client.

Decision to have a stage 1 performed off site must be justified and recorded. When decision is to have it stage 1 off site, the necessary information must be received from the customer to achieve the objectives of stage 1 as if it was performed on site. Off-site audit can be complemented by remote interviews of the clients.

When different standards are combined, the prevailing rules are the ones of the standard requiring a stage 1 audit to be performed on site.

Certification Body does not recommend back to back stage 1 and 2 and the interval between stage 1 and stage 2 shall not exceed 6 months. (First day of Stage 2 not performed later than 180 days after last day of Stage 1)

If stage 1 and stage 2 are planned back to back, the customer must be informed about the risk of having the stage 2 postponed if the stage 1 audit does not result in a satisfactory level of readiness of the client.

When stage 1 and stage 2 were performed back to back, the Shariah Advisor will review findings of stage 1 and stage 2 to verify that findings of stage 2 are not downgraded compared to the ones of stage 1 and that recommendation for certification is justified.

All audit time, whether it is 'On or Off Site' is chargeable (i.e. Audit Planning/Document Review/Auditing/Audit Reporting/NCR Closure).

Stage 1 - Initial audit:

Stage 1 audit shall be performed:

- To audit client production documentation
- To evaluate the client's location and site specific conditions and to undertake discussions with the client's personnel to determine the preparedness for the stage 2 audit
- To review the client's status and understanding regarding requirement of the standard, in particular with respect to the identification of key performance or significant aspects, processes, objectives and operations of the management system
- To collect necessary information regarding the scope of the management system, processes and locations of the client, and related statutory and regulatory aspects and compliance (e.g. quality, environmental, legal aspects of the client operation, associated risks, etc...)
- To review the allocation of resources for stage 2 and agree with the client on details of the stage 2
- To confirm that audit time and planning are considering the complexity of the sites (campus, multiple building...) and processes.
- To evaluate if the internal audits and management review are being planned and performed, and that the level of implementation of the management system substantiates that the client is ready for stage 2.

An audit report is produced at the end of stage 1 and is communicated to the client, including the identification of findings that could be non-conformities during the stage 2 audit.

Unsatisfactory Stage 1 can be repeated if needed. After satisfactory Stage 1 the arrangement for Stage 2 can be finalized (audit duration, audit team,

audit plan, interval between Stage 1 and Stage 2). (12)

Stage 2 - Main Audit:

The purpose of the stage2 audit is to evaluate the implementation, including effectiveness of the client's Halal management system during preparation, processing, packing, labeling, handling, distribution, serving and the overall aspects of the premises dealing with and storing Halal food and its products. Stage 2 is always performed on site.

It includes at least the following:

- Information and evidence about all the major and minor ingredients being used in the manufacturing process
- Process monitoring, measuring, reporting and reviewing against key performance objectives and targets (consistent with the expectations in the applicable Halal management system standard or other normative document)
- The client's Halal management system and performance as regards legal compliance
- Complete review of Slaughtering process
- Internal auditing and management review
- Management responsibility for the client's policies

An audit report is produced at the end of stage2, including the identification of findings of both stage 1 and 2.

Sampling:

1. Where necessary, the audit team shall take samples in sufficient quantities from production/service premises for the performance of the required inspections and tests.
2. If certification of halal products is based on testing/inspection of batches of the halal product, it shall be in accordance with a defined sampling schedule utilising statistically proven techniques with stated confidence levels. In specifying any requirements for sampling, the halal certification body shall establish documented procedures for the selection and control of samples to ensure traceability, and that they are representative of halal production.
3. Samples taken by the audit team shall be sent for analysis to the laboratory accredited under ISO/IEC 17025 or recognized upon the approval of halal competent authority.

Inspections and tests:

1. Inspections and tests on the halal product/service shall be determined in accordance with the requirements of the halal product/service and the national and/or regional or international legal provisions.
2. Laboratories that undertake inspections and/or analyses shall be accredited under ISO/IEC 17025 or shall be recognized upon the

approval of halal competent authority.

3. Where independent testing facilities are not available, the halal certification body should ensure that specified controls are in place at the supplier's testing facilities, that they are managed in a manner which provides confidence in the results obtained from that records are available to justify the confidence.

Surveillance Audits:

1. Surveillance audits shall be planned from the last day of the stage 2 audit, the frequency of surveillance audits shall typically be either every 6 or 12 months. Other frequencies may be used providing the number of audit days delivered over the period of the certification is consistent with the 6 and 12 month approach.

The first surveillance after an initial audit shall be performed within 12 month after the last day of stage 2 audit.

The period between surveillances shall not exceed 12 months. Justified changes on the surveillance audits will be recorded, the tolerance criteria is -3 months + 1 month.

Where surveillance periods are switch from 6 monthly to yearly intervals, extreme care should be taken to ensure no reduction in man-days occur over the surveillance period (current and future).

2. Team allocation requirements for surveillance activities are consistent with the requirements for initial and recertification audits.

3. Surveillance audits are performed to verify that representative areas and functions covered by the scope are monitored on a regular basis and take into account changes to clients and its management system

- Internal audit and management review
- Review of actions taken on NCR raised during the previous audits
- Complaints
- Review of any changes and
- Use of marks and any other references to certification

4. Surveillance may cover other topics such as;

- Enquiries to clients on aspects of certification
- Reviewing any client's statements with respects to its operations (promotional material, website)
- Request to the client to provide documents and records and
- Other means of monitoring the client performance

Recertification Audit:

1. Recertification audits shall be planned from the last date of the stage 2 audit

2. The purpose of a recertification audit is to evaluate the continued fulfillment of all of the requirements of the HALAL standard.

The scope of the recertification audit is to evaluate the following;

- Effectiveness of the whole HALAL standards considering internal and external changes and the management system continual relevance and applicability to the scope of certification
- Demonstrate commitment to maintain the effectiveness and improvement of the HALAL standards in order to enhance overall performance
- Whether the operation of the certified management system contributes to the achievement of the organization's policy and objectives

3. The recertification audit shall consider the performance of the Halal management system over the period of certification, and include the review of previous surveillance audit reports and the audit plan shall be set up accordingly.

4. When appropriate, Stage 1 can be offered at recertification, where there have been significant changes to the management system or the organization of the client. This can be offered to large clients to perform a review of previous cycle performance.

5. Halal certification owners (certified organization) should submit a recertification or renewal application six(6) months prior to the expiry date of current halal certificate.

6. Halal certificate owners who failed to renew their certification will not be allowed to use the halal mark at the premises or on the manufactured products.

Remote Audit:

If remote auditing techniques (interactive web-based collaboration, web meetings, teleconferences and/or electronic verification of the organization's processes) are utilized to interface with the organization, these activities should be identified in the audit plan and may be considered as partially contributing to the total "on-site auditor time".

When remote auditing activities represent more than 30% of the planned on-site auditor time, the Certification body shall justify the audit plan and obtain specific approval from the accreditation body prior to its implementation.

NOTE: On-site auditor time refers to the on-site auditor time allocated for individual sites. Electronic audits of remote sites are considered to be remote audits, even if the electronic audit is physically carried out on the organization's premises. Regardless of the remote auditing techniques used, the organization shall be physically visited at least annually.

Follow-up and short notice Visits:

1. At any stage of the certification cycle (Stage 2, surveillance and

recertification), if the results of corrective actions need to be verified on site e.g. as a result of a major nonconformity being raised or multiple minor nonconformities being raised, the Team Leader will initiate an additional follow-up visit

2. Short notice audits can also be arranged to address complaints when the complaint cannot be addressed remotely or the degree of importance of the complaint requires to do it before the next planned audit. Short notice audits may also be conducted after a suspension of a client.

The process for these audits is the same as any normal audit and the scope will focus on complaint investigation or determine whether the suspension can be lift up or not.

3. If a follow-up audit is to be conducted the Certification Body office shall arrange the date with the client and in conjunction with the Team Leader will also determine which auditor is most qualified to conduct the on-site follow-up audit.

References

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- ¹ (Halal Certificate and Halal Label Order, 2005 (S 39/05). Brunei Darussalam)
 - ² <http://www.thefreedictionary.com/audit>
 - ³ الأنبياء: ٤٧
 - ⁴ الإسراء: ٣٤
 - ⁵ معارف القرآن "مفتي محمد شفيع".
 - ⁶ Bcg Halal 3(Guideline For Certification Halal Compliance Auditor.Brunei Darussalam)
 - ⁷ PS 3733 (Halal Food Management system) Standard of PSQCA, Pakistan.
 - ⁸ Bcg Halal 3(Guideline For Certification Halal Compliance Auditor.BruneiDarussalam)
 - ⁹ PS 3733 (Halal Food Management system) Standard of PSQCA, Pakistan.
 - ¹⁰ PS 3733 (Halal Food Management system) Standard of PSQCA, Pakistan.
 - ¹¹ International Standard on Auditing.
 - ¹² International standard on Auditing.