



Risk by Association:

Navigating Supply Chain Uncertainty
with an FSSC 22000 Certified Partner

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Introduction

As many New Zealand businesses depend on access to global markets, there is a clear risk of association when partnering with suppliers lacking stringent certifications.

With a view to protect their own businesses, many Chief Executives, Procurement Managers and Sustainability Leads are ensuring purchasing decisions are made based on the level of certification held by their suppliers.

By reading this whitepaper, you'll gain an understanding of the various certifications in market and the degree of protection they afford your business, the connection between Environmental, Social and Governance (ESG) and FSSC 22000, and the real business risks you may face when engaging suppliers without FSSC 22000.



Before we delve into these topics, it's important to understand some of the key terminology we'll use throughout this document:

Food Safety System Certification, known as FSSC 22000, is a stringent and internationally recognised food safety management certification. To ensure food safety throughout the supply chain, FSSC 22000 is based on ISO 22000 but incorporates additional technical standards and sector-specific requirements.

This certification is focused on food safety, environmental, ethical trade and employment practices and other key indicators of ESG compliance.¹

Examples of companies who have adopted this level of certification include The Coca-Cola Company, Mars, Nestlé, Unilever and Snell.²

REFERENCE

[1] Foundation FSSC.(n.d.). FSSC 22000.[online]Available at: <https://www.fssc.com/fssc-22000/>

[2] Foundation FSSC. (2022).ISO 22000 to FSSC 22000. [online] Available at: <https://www.fssc.com/wp-content/uploads/2022/02/22.0210-ISO-22000-to-FSSC-22000-1.pdf>





Global Food Safety Initiative (GFSI) is an organisation that undertakes assessments of food safety management systems from around the world against a set of food safety requirements.

The assessment process that GFSI undertakes is called benchmarking, and a food safety management system is considered a GFSI-recognised scheme when it is benchmarked as meeting the food safety requirements.

Overseas manufacturers operating under a GFSI-recognised scheme are issued certificates to show that their food safety management system has met the high standard set by GFSI.

There are several GFSI-recognised schemes, such as BRCGS, IFS, SQF, FSSC 22000, and PrimusGFS.³

REFERENCE

[3] The Consumer Goods Forum (GFSI) (2025) GFSI-Recognised Certification Programme Owners. MyGFSI. Available at: <https://mygfsi.com/how-to-implement/recognition/certification-programme-owners>

The Current State





With many forward-looking New Zealand companies working to meet their ESG obligations and commitments, we have seen a subsequent focus on certification and compliance.

We experienced this shift ourselves in early 2024 when soon after making the decision to pursue FSSC 22000, we found several of our customers would now expect this as the mandatory requirement for supply of products into their business. Supermarkets and QSRs are among the businesses we're seeing require FSSC 22000 of their suppliers.

According to FSSC's publicly accessible register, Snell is one of the first warehousing companies in New Zealand to achieve FSSC 22000.

For access to our Auckland record, see footnote 4.

For our Christchurch record, see footnote 5.

Regardless of your business' stance regarding suppliers holding FSSC 22000, it is critical to partner with suppliers who hold the highest level of certification available in market. In doing so, you'll protect your business from regulatory breaches leading to potential fines and reputational damage.

REFERENCE

- [4] Foundation FSSC. (n.d.). Public Register: Snell – Auckland (NZL-1-0262-971260). [online] Available at: <https://www.fssc.com/public-register/NZL-1-0262-971260/>
- [5] Foundation FSSC. N.d.). Public Register: Snell – Christchurch (NZL-1-0262-741728). [online] Available at: <https://www.fssc.com/public-register/NZL-1-0262-741728/>

Understanding the Certifications in Market



Although FSSC 22000 is the highest level of food safety certification, a logical starting point is understanding the range of other certifications in market and the degree of protection they could provide to your business.

1

NO FOOD SAFETY CERTIFICATION

Businesses procuring from suppliers who hold no food safety certifications are at risk of brand damage, market access challenges and regulatory compliance issues.

2

HAZARD ANALYSIS & CRITICAL CONTROL POINT (HACCP)

HACCP is an internationally recognised methodology ensuring that businesses are meeting food safety standards. This can be used throughout all stages of the food chain.⁶

3

ISO 22000

ISO 22000 is an international standard that specifies the requirements for a food safety management system (FSMS). It is designed to ensure that organisations in the food chain can consistently provide safe products and services.⁷

4

FSSC 22000

FSSC 22000, a Global Food Safety Initiative, is a certification focused on food safety, environmental, ethical trade and employment practices and other key indicators of ESG compliance.⁸ Examples of companies who have adopted this level of certification include The Coca- Cola Company, Mars, Nestlé, Unilever and Snell.⁹

REFERENCE

- [6] Ministry for Primary Industries (MPI). (2020). Hazard Analysis and Critical Control Point (HACCP). [online] Available at: <https://www.mpi.govt.nz/food-business/food-safety-codes-standards/hazard-analysis-critical-control-point/>
- [7] International Organisation for Standardisation (ISO). (2018). ISO 22000:2018 – Food safety management systems- Requirements for any organization in the food chain. [online] Available at: <https://www.iso.org/standard/65464.html>
- [8] Foundation FSSC. (n.d.). FSSC 22000 [online] Available at: <https://www.fssc.com/fssc-22000/>
- [9] Groenveld, C. and Matthee, E. (2022) From ISO 22000 to FSSC 22000. FSSC 22000. 10 February. Available at: <https://www.fssc.com/wp-content/uploads/2022/02/22.0210-ISO-22000-to-FSSC-22000-1.pdf>



FSSC 22000: A CERTIFICATION WITH APPLICATIONS BEYOND FOOD SAFETY

There is a common misconception that FSSC 22000 is relevant only to food manufacturers, processors and packers.

In reality, FSSC 22000 has the potential to protect businesses of all sizes, irrespective of industry, due to the stringent standards it enforces with benefits beyond food safety.

“FSSC 22000, including v6 which Snell holds, is a risk-based certification.

To hold FSSC 22000 v6, your business’ end to end value chain is analysed with a view to identify, then manage and minimise or eliminate risk.

This certification takes a broad view of risk which includes labour practices throughout the supply chain, malicious interference with products and more.

As a result, it is the gold standard for protecting your business, irrespective of industry”.

- Scott Andrews, Snell’s National Compliance Manager.

Note, as of April 2024, Version 6 of the FSSC 22000 Scheme became mandatory for all organisations seeking FSSC 22000 certification.¹⁰

REFERENCE

[10] Foundation FSSC. (2024). FSSC 22000 Version 6 becomes mandatory as of 1 April 2024. [online] Available at: <https://www.fssc.com/insights/fssc-22000-version-6-becomes-mandatory-as-of-1-april-2024/>



The Connection Between FSSC 22000 & ESG





In addition to having relevance across industries, FSSC 22000 also aids businesses in meeting their ESG obligations.

Through understanding the commonalities between ESG and FSSC 22000, many businesses are surprised to learn of the shared foundations which makes integrating these two approaches both beneficial and practical.

Here is an overview of several ESG related risks which you can mitigate by partnering with an FSSC 22000 supplier:



ENVIRONMENTAL

Climate change impacts food safety management systems

Rising global temperatures and changes in climate conditions affect efficiency and transportation

Risk assessments evaluate suppliers' environmental practices to ensure sustainable sourcing

Encouragement in a reduction of food wastage, packaging waste and inefficiencies in production for a lower carbon footprint and reduction in pollution

Alignment with ISO 14001 (an environmental management system), support broader environmental management frameworks.



SOCIAL

Core foundation of FSSC 22000 is ensuring food safety across the supply chain to directly protect communities

Focus on supply chain transparency to ensure the actions of your suppliers align with your business values

Supplier management and risk assessments consider social risks such as child labour and poor labour conditions especially when integrated with ISO 26000 (for businesses committed to operating in a socially responsible way)

Requirements of training and awareness for staff, supporting upskilling and a safe working environment.



GOVERNANCE

Requirements for food safety risk assessments, management of reviews and corrective actions

Promotes transparency and traceability, supporting internal governance frameworks

Ensures companies meet legal and regulatory requirements related to food safety to reduce liability

Certification outcomes and risks can be integrated into broader governance responsibilities, such as sustainable reporting and ESG disclosures

Regulations from governments are evolving, so adaption is essential.



Looking Ahead: Certification as a Risk Mitigation Strategy

In an increasingly globalised world in which New Zealand businesses are facing increasing pressure to meet their ESG obligations, companies are requiring higher levels of certification to protect their own operations. As a result, we have seen HACCP declining in importance as many large New Zealand businesses favour more stringent certifications, such as FSSC 22000.

HACCP is focused on the prevention of unintentional/accidental adulteration and food borne illness.¹¹ By contrast, FSSC 22000 seeks to mitigate the possibility of intentional acts of product interference, including employee tampering or international crime, via a Food Fraud Vulnerability Assessment.¹²

Additionally, Supplier Ethical Data Exchange (SEDEX) is a collaborative, globally recognised platform for sharing ethical supply chain data. The system helps reduce risk, protect companies' reputations and improve supply chain practices.

REFERENCE

[11] Foundation FSSC. (2023). Guidance Document: Food Defense – FSSC 22000 Version 6. [online] Available at: https://www.fssc.com/wp-content/uploads/2023/03/FSSC-22000-V6-Guidance-Document-Food-Defense_2023.pdf

[12] Foundation FSSC. (2023). Guidance Document: Food Fraud Mitigation – FSSC 22000 Version 6. [online] Available at: <https://www.fssc.com/wp-content/uploads/2023/03/Guidance-Document-Food-Fraud-Mitigation-V6-1.pdf>





The importance of taking such steps becomes clear in the context of the following quote from a New Zealand Treasury report:

“New Zealand has one of the most exposed supply chain positions across advanced economies”.¹³

Due to New Zealand's geographic location, it has a particularly exposed supply chain. This was evident during the COVID-19 period as many businesses faced delays and higher costs. There is also a reliance on imports by many New Zealand businesses, with China being our largest source of imports.¹⁴

The combination of factors which put New Zealand's supply chain at risk mean it's crucial that your suppliers hold the highest level of certification to avoid unprecedeted business disruption, fines or regulatory challenges.

REFERENCE

- [13] Skilling, D. (2022). Supply Chains to the Last Bus Stop on the Planet: An international perspective on strengthening New Zealand's supply chain resilience. [online] New Zealand Productivity Commission. Available at: <https://www.treasury.govt.nz/sites/default/files/2024-05/pc-inq-ier-supply-chains-to-the-last-bus-stop-on-the-planet.pdf>
- [14] New Zealand China Council. (n.d.). Statistics: New Zealand's goods exports and top sources of imports. [online] Available at: <https://nzchinacouncil.org.nz/statistics/#:~:text>New%2520Zealand%2520Exports%2520Top,zealand/imports%252Dby%252Dcategory>

SCENARIO

FOOD SAFE PACKAGING INCORRECTLY STORED CAUSING CONTAMINATION



THE SITUATION

Following the delivery of food safe packaging to a customer's site, the supplier who stored the packaging for several weeks reported a rodent infestation at their facility.

THE IMPACT

Due to potential contamination, the packaging had to be recalled by the supplier and destroyed. Despite the packaging being insured, there were financial ramifications for the customer, including loss of investment and supply chain disruption which included a failure to supply into supermarkets and other retailers. Packaging sourced via other suppliers was also at risk as it was stored in close proximity to the packaging exposed to the rodent infestation.

POTENTIAL RISK MITIGATION MEASURES

Operating a dedicated food safe warehouse provides protection against contamination. As FSSC 22000 evaluates the supply chain end to-end, customers can have greater confidence that their product is safeguarded at every stage.

SCENARIO

GLOVE MANUFACTURER RECALLS PRODUCT DUE TO EVIDENCE OF FORCED LABOUR



THE SITUATION

A glove manufacturer was found to have been utilising modern slave labour as workers were being forced to work 12-hour shifts, six days a week while receiving little remuneration and living in overcrowded dormitories.

THE IMPACT

Once the poor working conditions were publicised, a widespread product recall was actioned due to the breach of numerous laws, as well as ESG obligations and commitments. As gloves are a critical product in many businesses, an inability to source a suitable alternative can halt production and impact your ability to operate.

POTENTIAL RISK MITIGATION MEASURES

FSSC 22000 requires end-to-end supply chain analysis to identify and manage risk, which mitigates the risk of ESG breaches at any point in the supply chain. Compliance should be enhanced by a mutually signed Supplier Code of Conduct which is underpinned by regular in-person reviews to ensure your suppliers' practices align with your business' requirements.

Your Decision

Regardless of the industry you operate in, FSSC 22000 and equivalent certifications provide you, your Board, and your customers with peace of mind. As end consumers demand increasing transparency regarding the origins of raw materials and finished goods, it's a strategic imperative to meet your Environmental, Social and Governance obligations with a foundation of stringent certification, such as FSSC 22000.

As the trusted partner to some of New Zealand's largest manufacturing, food processing and agricultural companies, we have seen the shift towards partnering only with those who hold FSSC 22000 or an equivalent certification as it becomes a license to operate.





Auckland

6-10 Goodman Place
Penrose, Auckland
09 622 4141

Hamilton

2 Maui Street
Pukete Industrial Estate, Hamilton
07 850 1077

Wellington

133 Gracefield Road
Seaview, Lower Hutt
04 566 9456

Christchurch

2 Gerald Connolly Place
Hornby, Christchurch
03 344 1995

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