



GFSI BENCHMARKING REQUIREMENTS
VERSION 2024

PART I THE GFSI BENCHMARKING PROCESS

Part I - The GFSI Benchmarking Process

Contents

Introduction	3
1. Section 1: Eligibility Criteria	3
2. Scopes of Recognition	4
Table 1: the GFSI scopes of recognition.	4
3. Application Requirements for GFSI Recognition	7
4. The GFSI Benchmarking Methodology	7
Who is involved in the GFSI Benchmarking Process?	7
How much time does the GFSI Benchmarking Process take to complete?	8
Demonstrating alignment and Objective Evidence	8
GFSI Assessment outcome	8
5. The Key Procedural Steps	9
A. APPLICATION	9
B. DESKTOP REVIEW	10
C. OFFICE VISIT	11
D. CORRECTIVE ACTION PLAN	11
E. PUBLIC STAKEHOLDER CONSULTATION	11
F. IMPLEMENTATION OF CORRECTIVE ACTIONS	11
G. GFSI STEERING COMMITTEE FINAL DECISION AND COMMUNICATION	12
H. ANNUAL MONITORING OF CONTINUED ALIGNMENT	12
6. Sanctioning	14
Appendix 1 — Work Plan	16

INTRODUCTION

The Global Food Safety Initiative aims to improve food safety and business efficiency. The Global Food Safety Initiative Coalition has three key objectives:

1. Benchmarking and Harmonisation
2. Capability Building
3. Public-Private Collaboration

GFSI's work in benchmarking and harmonisation fosters mutual acceptance of GFSI-recognised Certification Programmes across the industry and enables a simplified "once certified, recognised everywhere" approach. This reduces inefficiencies from duplication of audits and helps reduce trade barriers. The GFSI Benchmarking Requirements are built through consensus of experts; they form a shared and widely accepted understanding of what constitutes a robust food safety certification programme.

Part I of the GFSI Benchmarking Requirements specifies the GFSI Benchmarking Process, the method for the recognition of food safety Certification Programmes. The objective of this document is to give a clear insight into this process. Further details may be provided on request and during the application process.

The steps and procedures detailed in this document ensure that the GFSI Benchmarking Process is:

- Carried out in an impartial and transparent manner by a technically competent Benchmarking Leader under the supervision of the GFSI Senior Technical Manager,
- Transparent and open to stakeholder scrutiny,
- Reviewed, maintained and updated to ensure consistency and integrity.

A Certification Programme may have a major focus or a historical focus on areas other than those related to food safety. However, for the purposes of GFSI recognition, only specified food safety requirements in the Certification Programme shall be assessed by GFSI.

A 'Glossary' of terms used within the GFSI Benchmarking Requirements is provided in Part IV. This document is an integral part of the GFSI Benchmarking Requirements; therefore, definitions shall be applied accordingly within the Certification Programmes.

Additionally, we have published an Implementation Handbook to help provide detailed guidance and clarity on the Benchmarking Process. This comprehensive resource outlines key steps, best practices, and examples where necessary to support with the implementation process for Certification Programmes effectively.

All engagement with GFSI is underpinned by three key elements and all stakeholders shall adhere to these at all times:

- CGF Antitrust statutes.
- GFSI Governance Model and Rules of Procedure.
- GFSI Code of Ethical Conduct.

Any demonstrable breach of the above would allow GFSI to discontinue all communication with the stakeholder and further action in line with GFSI Governance rules will be followed.

For further information and support:
gfsibm@theconsumergoodsforum.com.

1. Section 1: Eligibility Criteria

All Certification Programme Owners who wish to apply for GFSI Recognition are required to satisfy the eligibility criteria below:

- The Certification Programme Owner is a legal entity,
- There is commitment from a minimum of three organisations representing the retail / food service or producing / manufacturing sectors to use the Certification Programme,
- The Accreditation Bodies granting accreditation to the scope of the Certification Programme shall be members of the International Accreditation Forum

(IAF) and shall be signatories to the Multilateral Recognition Arrangement (MLA),

- The Certification Programme Owner has contractual relationships with preferentially two Certification Bodies that have accreditation for the scope of their Certification Programme,
- The Certification Programme Owner is not undergoing any significant changes or situations that may impact the GFSI recognition status.
- The Certification Programme Owner does not have any practices deemed as restricting access to markets,

- The Certification Programme Owner has undertaken a self-assessment to validate that it is in alignment with the GFSI Benchmarking Requirements. The self-assessment shall be made available to the Benchmark leader when requested (see Section 5 Desktop Review).

2. Scopes of Recognition

GFSI has defined scopes of recognition related to products or services, listed in table 1.

When selecting the GFSI scope(s) of recognition for their application, the Certification Programme Owner shall ensure that the GFSI Benchmarking Requirements related to their selected GFSI scope(s) of recognition are clearly addressed in their normative documents, as these form the basis of the assessment criteria, namely:

- Part II of the GFSI Benchmarking Requirements defining the key elements applicable to the

Certification Programme Owner applying for recognition, regardless of their selected GFSI scope of recognition,

- Part III of the GFSI Benchmarking Requirements defining the key elements applicable to the Certification Programme Owner, only those key elements defined in the GFSI Benchmarking Requirements for the specified GFSI scope(s) of recognition included in the application will apply. To add additional scope(s), see Section 3 Application Requirements for GFSI Recognition.

Table 1: The GFSI scopes of recognition

GFSI SCOPE OF RECOGNITION (BENCHMARKING CATEGORY CODE)	BENCHMARKING CATEGORY NAME	SCOPE NUMBER / SCOPE NAME / SCOPE DEFINITION
AI	Farming of Animals for Meat/ Milk / Eggs / Honey	Raising of animals (other than fish and seafood) used for meat production, egg production, milk production or honey production. Growing, keeping, trapping and hunting (slaughtering at point of hunting) Associated temporary farm packing without modification or processing of the product.
AII	Farming of Fish and Seafood	Raising of fish and seafood used for meat production. Growing, trapping and fishing (slaughtering at point of capture). Associated temporary farm packing without modification or processing of the product.
BI	Farming of Plants (other than grains and pulses)	Growing or harvesting of plants (other than grains and pulses), including horticultural products and hydrophytes for food. On farm storage of plants (other than grains and pulses), including horticultural products and hydrophytes for food.

BII	Farming of Grains and Pulses	Growing or harvesting of grains and pulses for food On farm storage of grains and pulses for food.
BIII	Pre-Process Handling Of Plant Products	Activities on harvested plants, including horticultural products and hydrophytes for food, that keep the products whole and integral. Cleaning, washing, rinsing, fluming, sorting, grading, trimming, bundling, cooling, hydro-cooling, waxing, drenching, packing, repacking, staging, storing, loading/or any other handling activity that does not significantly transform the product from its original harvested form.
CO	Animal Primary Conversion	Conversion of animal carcasses intended for further processing, including lairage, slaughter, evisceration, bulk chilling, bulk freezing, bulk storage of animals and game gutting, bulk freezing of fish, storage of game.
CI	Processing of Perishable Animal Products	Production and packing of animal products including fish and seafood, meat, eggs, dairy and fish products, perishable pet food from animal products only. Deboning, cutting, washing, trimming, grading, pasteurisation, cooking, curing, fermentation, smoking, chilling, freezing, packed in modified atmosphere, packed in vacuum packing.
CII	Processing of Perishable Plant Products	Production of plant products, including fruits and fresh juices, vegetables, grains, nuts, pulses and perishable pet food from plant products only. Washing, slicing, dicing, cutting, shredding, peeling, grading, pasteurisation, cooking, chilling, juicing, pressing, freezing, packing in modified atmosphere, packed in vacuum packing or any other activity that significantly transforms the product from its original whole state.
CIII	Processing of Perishable Animal and Plant Products (Mixed Products)	Production of mixed animal and plant products, including ready to eat and perishable pet food. Mixing, cooking, chilling, freezing, packing in modified atmosphere, packed in vacuum packing.
CIV	Processing of Ambient Stable Animal and Plant Products (Mixed Products)	Production of food products from any source that are stored and sold at ambient temperature, including canned food and ambient stable pet food. Aseptic filling, baking, bottling, brewing, canning, cooking, distilling, drying, extrusion, fermentation, freeze drying, pressing, frying, hot filling, irradiating, milling, mixing and blending, packing in modified atmosphere, packed in vacuum packing, pasteurisation. pickling, roasting, salting and refining.
D	Production of feed	Production of feed from a single or mixed food source, intended for food-producing animals. Cooking, milling, mixing and blending and extrusion.

E	Catering	Preparation, storage and, where appropriate, delivery of food products for consumption at the place of preparation or at a satellite unit. Cooking, mixing and blending, preparation of component products.
FI	Retail/Wholesale	Buying and selling of food, feed and/or packaging products to a customer, including minor processing activities in counters when this is not the main activity of the business.
FII	Food Broker/ Agent	Buying and selling of food, feed and/or packaging products, excluding the production, storage and any physical handling of the product.
H	Provision of Food Safety Services	Provision of services related to the safe production of food, feed and/or packaging, including water supply, pest control, cleaning services, waste disposal.
G	Provision of Storage and Distribution Services	Storage facilities and distribution vehicles for the storage and transport of food, feed and/or packaging products. Note: any packing with labelling activities are excluded.
I	Production of Food Packaging	Production of food and feed packaging materials. Packaging components in the form of raw materials, part processed, semi converted, converted or fully finished packaging materials and products for use in the supply chain.
JI	Hygienic Design of Food Buildings and Processing Equipment (for building constructors and equipment manufacturers)	Manufacturers of equipment, including any components necessary to link them together, and their utilities and utensils necessary for their operation, for farms food production facilities, food retail and wholesale operations, and packaging dedicated to food; Architects, Engineers and Designers of food handling facilities, including farm, food manufacturing, storage and retail buildings; The builders of above facilities.
JII	Hygienic Design of Food Buildings and Processing Equipment (for building and equipment users)	Specifying, purchasing, design and construction of buildings or refurbishments by farmers, food manufacturers, wholesalers and retailers, and packaging manufacturers for their own use; specifying, purchasing, design and construction of equipment, including any components necessary to link them together, and their utilities and utensils necessary for their operation, and facilities by farmers, food manufacturers, wholesalers and retailers, and packaging manufacturers for their own use.
K	Production of (Bio) chemicals and bio-cultures used as food ingredients or processing aids in food production	Production of food and feed additives, vitamins, minerals, biocultures, flavourings, enzymes and processing aids. Note: pesticides, drugs, fertilizers and cleaning agents are excluded.

3. Application Requirements for GFSI Recognition

Certification Programme Owners seeking GFSI recognition need to apply for GFSI recognition in the following situations:

1. Initial Benchmarking: The Certification Programme has not previously undergone benchmarking.

2. Re-submission: A previous benchmarking application was initiated but withdrawn before completion and requires a new submission or a previous application resulted in non-recognition (see Section 5- G. GFSI Steering Committee Final Decision and Communication).

3. New version of the GFSI Benchmarking requirements is published: The Certification Programme has successfully completed benchmarking against an earlier version of the GFSI Benchmarking Requirements and now seeks recognition of its currently recognised programme/s to meet the new version of the Benchmarking requirements.

PLEASE NOTE: To obtain recognition after a new version of the GFSI Benchmarking Requirements is published, Certification Programme Owners must apply for re-assessment for all scopes for which they are seeking recognition within nine months of the new version's release date. The GFSI Steering Committee may extend this deadline under special circumstances, on a case-by-case basis.

4. Rebenchmarking:

- The Certification Programme requires adding a new scope of GFSI recognition (scope extension) to an already recognised Programme.
- The Certification Programme has already been recognised against the current version of the GFSI Benchmarking Requirements but wishes to apply for recognition for an updated Programme version or sub version,
- For Certification Programmes undergoing changes that may impact existing GFSI recognition, such as modifications to governance, ownership, management systems, or normative documents.
- Where the GFSI recognition for a Certification Programme has been suspended and the Programme Owner seeks to re-establish its recognition status.

In all cases, Certification Programme Owners must submit a completed application form with documentation demonstrating alignment with GFSI eligibility criteria (refer to Section 1).

4. The GFSI Benchmarking Methodology

Who is involved in the GFSI Benchmarking Process?

GFSI Senior Technical Manager

A GFSI Senior Technical Manager is responsible for safeguarding the GFSI Benchmarking Process. They appoint the Benchmark Leader to a Certification Programme and supervise all the benchmarking activities and communication with the Certification Programme Owner. The GFSI Senior Technical Manager ensures training and calibration of the Benchmark Leaders. The GFSI Director may appoint a deputy to oversee the benchmarking process in the absence of the GFSI Senior Technical Manager, as deemed necessary.

Benchmark Leader

Ordinarily, a Benchmark Leader is a full-time employee of the Consumer Goods Forum. Their main responsibility is to ascertain whether a Certification Programme conforms with the GFSI Benchmarking Requirements. They will conduct the assessment on a Certification Programme for three assessment cycles.

The Benchmark Leader reports to the GFSI Senior Technical Manager; they perform the assessment of the Certification Programme against the GFSI Benchmarking Requirements and give their recommendation whether to recognise a Certification Programme based on the result of their assessment.

All Benchmarking Leaders undergo the same initial training and annual calibration activities to maintain alignment of their evaluation approaches.

GFSI Director

The GFSI Director is accountable for the compliance to the GFSI Benchmarking Process. In particular, they oversee any necessary sanctioning activities. They may reassign the Benchmark Leader at any time, at their discretion, if it is deemed necessary to do so.

GFSI Steering Committee

The GFSI Steering Committee makes a final decision on GFSI recognition of the Certification Programme, based on the information provided to them by the Benchmark Leader and the GFSI Senior Technical Manager. The GFSI Steering Committee also makes final decisions on any suspensions or withdrawals of GFSI recognition.

Technical sub Committee

The GFSI Technical sub Committee is the committee responsible for the GFSI benchmarking requirements. The committee are the adjudicators in the event of non-alignment.

How much time does the GFSI Benchmarking Process take to complete?

The GFSI Benchmarking Process must be completed in a maximum of 12 months from the date GFSI accepts an application. However, the GFSI Steering Committee has the authority to extend this timeline, if deemed necessary to do so.

Demonstrating alignment

To maintain their recognition status, GFSI-recognised Certification Programmes must apply for re-assessment of all their recognised scopes against the new version of the GFSI Benchmarking Requirements within nine months of its publication date. The GFSI Steering Committee holds the authority to extend this period under special circumstances.

GFSI Assessment outcome

The GFSI Benchmarking Process is a pass/fail benchmark. A key element is either met or not met.

5. The Key Procedural Steps

The GFSI Benchmarking Process shall be carried out in accordance with the following key procedural steps: against Part II and Part III of the GFSI Benchmarking Requirements,

A. Application

B. Desktop Review

C. Office Visit

D. Corrective Action Plan

E. Public Stakeholder Consultation

F. Completion of Corrective Actions

G. GFSI Steering Committee final decision and communication

H. Monitoring of Continued Alignment

A. APPLICATION

Certification Programme Owners may apply for assessment via the GFSI website and email. The Application Form including detailed guidance for its completion is available on the GFSI website. The completed form along with the supporting documentation providing evidence that the Certification Programme Owner satisfies GFSI Eligibility Criteria (see Section 1) shall be sent to GFSI.

The GFSI Senior Technical Manager will review the application to ensure all necessary evidence is available or may request further information as required. The GFSI Technical Manager reserves the right to reject or refer an application back to the Certification Programme Owner if information provided is deemed unsatisfactory. Where the application is referred back to the Certification Programme Owner, they shall resubmit an updated application with the requested amendments to the GFSI Senior Technical Manager.

Where the initial application is rejected, the Certification Programme Owner will be provided with a list of issues identified and recommended steps for remediation. Once the necessary actions are completed and the implemented corrective measures are verified by the GFSI Technical Manager, a new application may be submitted. However, the Certification Programme Owner is permitted to submit multiple applications for other scopes that are not included within the unsuccessful application.

The GFSI Senior Technical Manager will inform the Certification Programme Owner within 2 weeks of receiving the application if it is accepted, amends are required to process the application further or rejected:

- If the application is rejected, reasons for this decision will clearly be detailed,

- If the application is accepted, a contract shall be signed between the Certification Programme Owner and GFSI.

Once the contract is signed by both parties, the GFSI Senior Technical Manager will appoint a Benchmark Leader for the Certification Programme assessment.

The GFSI Technical Manager shall inform the Certification Programme Owner of this appointment in writing. Upon request from the Certification Programme Owner, additional impartiality or confidentiality agreements may be signed between GFSI and the Benchmark Leader.

The Certification Programme Owner will agree the work plan (appendix 1) of activities and key dates with the Benchmark Leader and the GFSI Senior Technical Manager based on the number of scopes and the volume of documentation submitted.

Application Restrictions Ahead of GFSI Benchmark Requirements Update

In the year prior to the publication of a new version of the GFSI Benchmarking Requirements, no new application will be accepted. A notification will be sent out to existing CPO's and notice will be displayed on the GFSI website to indicate the starting date of this one-year period.

Additionally, GFSI will not accept any applications for scope extension from existing Certification Programme Owners in the last six months before the publication of a new version of the GFSI Benchmarking Requirements. This does not apply to sub-versions of the GFSI Benchmarking Requirements (see Glossary).

B. DESKTOP REVIEW

The Certification Programme Owner Fills out the Self-Assessment forms.

The objective of the self-assessment is to allow the Certification Programme Owner to demonstrate that the Certification Programme includes all the key elements listed in the GFSI Benchmarking Requirements, including Part II as well as the applicable scopes of GFSI Benchmarking Requirements Part III.

GFSI will provide self-assessment forms for Part II and each of the GFSI scopes of recognition included in the Certification Programme Owner's application form. The Certification Programme Owner shall complete those forms with their own assessment of their alignment to the GFSI Benchmarking Requirements as well as clear and precise justification against each key element, including the exact reference to the document, page and clause addressing each key element. The completed self-assessment forms as well as the referenced documents shall be sent to the Benchmark Leader for review.

The Benchmark Leader performs a preliminary desk review.

The Benchmark Leader will review the evidence provided by the Certification Programme Owner for each GFSI key element, to ensure it satisfies the GFSI Benchmarking Requirements.

The Benchmark Leader will take note of any key elements where additional information is needed and/or where they do not agree with the self-assessment from the Certification Programme Owner. These notes will include comprehensive explanations. All these findings will be sent to the Certification Programme Owner in writing for consideration. Findings will also be sent to the GFSI Senior Technical Manager for review.

In a Conference Call, the Benchmark Leader Exchanges Their Detailed Findings with the Certification Programme Owner.

This will give the Certification Programme Owner an opportunity to further clarify and complete their evidence. It will also provide greater insight into what additional information and amendment to the self-assessment forms the Benchmark Leader requires. During the conference call, a timeframe shall be agreed to complete any corrections of the self-assessment forms and the workplan shall be reviewed accordingly.

The Certification Programme Owner Updates (where applicable) and Resends Final Self- Assessment

Within the agreed timeframe, the Certification Programme Owner shall send updated self-assessment forms with additional information. In order to limit a possible back-and-forth exchange of information, the Certification Programme Owner shall be required to provide the requested information and/or adjustments in the final self-assessment. The final version of the self-assessment forms must be complete and validated by the Benchmark Leader before progressing to the next step of the GFSI Benchmarking Process.

The Benchmark Leader may recommend at this point that the process moves to the final recognition recommendation:

- If the desktop review highlights that the Certification Programme requires significant changes to align to the Benchmarking Requirements;
- If the deadline of the process does not allow for an office visit and a public consultation.

In such situations, the GFSI Senior Technical Manager will review the recommendation from the Benchmark Leader and will agree the next steps with the Certification Programme Owner.

C. OFFICE VISIT

The Benchmark Leader and the Certification Programme Owner will mutually agree a date to visit the nominated office of the Certification Programme Owner. The purpose of the visit is to assess the implementation of the GFSI Benchmarking Requirements Part II through a sample record review.

The Certification Programme Owner shall ensure that all resources to support the visit including relevant employees, documentation and records are available.

The Benchmark Leader will confirm an agenda and required documentation for review at least

two weeks before the office visit. The GFSI Senior Technical Manager may join the office visit as an observer and adviser to the Benchmark Leader, who will lead the visit.

The Benchmark Leader will sum up all findings from the desktop review and the office visit on a report that will be signed between the Certification Programme Owner and the Benchmarking Leader before leaving the Certification Programme Owner's premises. A copy of this signed report will be given to the Certification Programme Owner, while the Benchmark Leader will retain one for GFSI records.

D. CORRECTIVE ACTION PLAN

The Certification Programme Owner shall respond to the Benchmark Leader's report with a corrective action plan within four weeks of the office visit.

The Benchmark Leader will review the corrective action plan and confirm whether it addresses the findings. Once the Benchmark Leader and the Certification Programme Owner agree a full corrective action

plan addressing all findings, the Benchmark Leader will send their draft assessment report, including the proposed corrective action plan, to the GFSI Senior Technical Manager for validation.

The GFSI Senior Technical Manager will review the assessment report and include their assessment of the Corrective Action plan to this report.

E. PUBLIC STAKEHOLDER CONSULTATION

The GFSI Senior Technical Manager will make the self-assessment forms and the Benchmark Leader's assessment report available on the GFSI website for a stakeholder consultation of four weeks. The Certification Programme Owner will be given the opportunity to approve the content of the published documents before it is made available in the public domain. The report will only be put to consultation once agreed by all above parties. The GFSI Senior Technical Manager will collect any comments, observations

or objections made by stakeholders and will share them with the Certification Programme Owner, who shall address them. The Benchmark Leader and the GFSI Senior Technical Manager will evaluate every response from the Certification Programme Owner.

The GFSI Senior Technical Manager will ensure that those stakeholders who submitted comments during the stakeholder consultation receive feedback.

F. IMPLEMENTATION OF CORRECTIVE ACTIONS

This step ensures verification that the planned corrective actions to address any non-conformities are fully implemented in the Certification Programme,

The Certification Programme Owner shall complete all required corrective actions and provide evidence of implementation to the Benchmark Leader.

The Benchmark Leader will validate the answers from the Certification Programme Owner to the comments and findings of the assessments, and

the implementation of the corrective actions. Once the corrective actions are fully implemented, the Benchmark Leader will send the final assessment report including the completed corrective action plan and a recommendation for recognition to the GFSI Senior Technical Manager for validation.

G. GFSI BOARD FINAL DECISION AND COMMUNICATION

The GFSI Senior Technical Manager will inform the GFSI Steering Committee of the results of the Benchmark Leader's assessment and the recommendation for recognition in the form of a final summary report previously agreed upon with the Certification Programme Owner.

The GFSI Steering Committee will come to a decision based on consensus following the summary report presented by the GFSI Senior Technical Manager. A quorum of 75% of the GFSI Steering Committee is required to determine the final decision. Records shall be kept of the numbers of votes for, against and abstaining. The GFSI Senior Technical Manager will communicate the GFSI Steering Committee decisions in writing to the Certification Programme Owner, as soon as is practicable after the GFSI Steering Committee decision.

In the event that the final decision of the GFSI Steering Committee is non-recognition, the reasons for the decision will be clearly documented and the GFSI Senior Technical Manager will make the Certification Programme Owner aware of the decision and those reasons. The Certification Program Owner may reapply after implementing all necessary amendments

and ensuring they are fully prepared for resubmission (see Section 3- Application requirements for GFSI Recognition). The Certification Programme Owner shall have the right to appeal against the GFSI Steering Committee's Board decision; the appeal shall be undertaken in accordance with the procedures specified in this document (see section 6-Sanctioning).

In the event recognition is granted by the GFSI Steering Committee, the GFSI Senior Technical Manager and the Certification Programme Owner will agree on a GFSI news release confirming this decision. The Certification Programme Owner shall be expected to issue a similar news release. The timing of these announcements shall be agreed on by the GFSI Senior Technical Manager and the Certification Programme Owner.

The GFSI Senior Technical Manager will ensure that the GFSI website is updated with the new recognition status and scope(s) of the Certification Programme Owner.

The GFSI Senior Technical Manager will issue a statement of conformity to the Certification Programme Owner.

H. ANNUAL MONITORING OF CONTINUED ALIGNMENT

This step ensures that the Certification Programme Owner is monitored regularly and continues to comply with the GFSI Benchmarking Requirements.

The Global Food Safety Initiative has the responsibility to create a transparent and level playing field for all Certification Programme Owners undergoing benchmarking against the GFSI Benchmarking Requirements. In order to ensure that recognised Certification Programme Owners have implemented all the controls necessary to ensure food safety, GFSI will carry out an annual monitoring of continued alignment.

The annual monitoring of continued alignment consists of four types of activities:

1. Record review — twice a year,
2. Certification Programme Owner office audit — once a year,

3. Gap analysis against any additions introduced to the GFSI Benchmarking Requirements with the publication of sub-versions,
4. Complaint investigation—incident driven.

Content of the Record reviews

Twice a year, the Benchmark Leader will remotely select at least five random audits, performed by various Certification Bodies against the Certification Programme and request a list of objective evidence and files related to these audits to verify alignment of Part II of the GFSI Benchmarking Requirements, including but not restricted to:

- Certificate and report and / or auditor notes,
- Contract with the Certification Body,
- Qualifications of the auditor,
- Scope allowance of the auditor.

The Benchmark Leader may increase the number of selected audits if:

- 5 samples do not allow for a representative sampling of the Certification Programme Owner's scope(s) of recognition and/or number of certificates,
- Authenticated complaints (see complaint investigation) or results of previous assessments raise concerns over the continued alignment of the Certification Programme to the GFSI Benchmarking Requirements.

The Certification Programme Owner shall submit the requested records within two weeks of the Benchmark Leader's request. The Certification Programme Owner and the Benchmark Leader will agree on the most convenient manner to allow the Benchmark Leader to verify those records.

The Benchmark Leader will report back their findings to the Certification Programme Owner and the GFSI Senior Technical Manager. These findings will be discussed during the office audit.

Content of the Office Audit

The purpose of the visit is to check the implementation of Part II of the GFSI Benchmarking Requirements by the Certification Programme Owner through a sample record review.

The Benchmark Leader will add the findings of this office audit to the findings of the record review and send this to the Certification Programme Owner and the GFSI Senior Technical Manager.

The Certification Programme Owner shall respond with a corrective action plan for all findings within four weeks of the office visit. The Benchmark Leader will validate the corrective action plan and submit this to the GFSI Senior Technical Manager, who will validate it with the GFSI Technical Sub-Committee and/or the Steering Committee. The Benchmark Leader will then verify the implementation of those corrective actions based on the Corrective Action Plan agreed with the Certification Programme Owner and validated by the GFSI Senior Technical Manager and the GFSI Technical Sub-Committee and/or the Steering Committee. If the corrective action plan is not validated by the Technical Sub-Committee and/or the Steering Committee or the Certification Programme Owner fails to implement it within the agreed timeline, the GFSI Senior Technical Manager and the GFSI Director may initiate the sanctioning process.

Gap analysis

Once a year, typically in conjunction with the first record review, the Benchmark Leader will review the alignment of the Certification Programme Owner to any new or amended key elements included in the Benchmarking Requirements since the last assessment of the Certification Programme Owner.

Complaint Investigation

The GFSI Senior Technical Manager is responsible for overseeing the investigation of any serious complaint they receive towards a GFSI-recognised Certification Programme. This can be done by a desktop investigation or an office visit. The GFSI Senior Technical Manager is responsible for the investigation of any complaints or suspected non-alignment of a GFSI-recognised Certification Programme with the GFSI Benchmarking Requirements.

In the event that the GFSI Senior Technical Manager receives a complaint or report regarding the non-alignment of a Certification Programme with the GFSI Benchmarking Requirements, they will promptly acknowledge, in writing, the receipt of the complaint or report to the party concerned and initiate the required investigative procedures to verify the accuracy of the complaint.

The GFSI Senior Technical Manager will ensure that the details of the complaint are clearly understood and documented, and that any claims or comments made by the complainant are properly authenticated and appropriately documented. This authentication will be verified as being accurate and correct by independent sources, in addition to the complainant. It is the responsibility of the complainant to provide information that appropriately authenticates the complaint and can be confirmed as genuine. The GFSI Senior Technical Manager is responsible for carrying out complaint investigations. They may appoint a Benchmark Leader or an independent assessor at any stage during the investigation process. The GFSI Senior Technical Manager must ensure impartiality and preserve confidentiality.

If a Benchmark Leader or an assessor is appointed, they will carry out a thorough investigation of the complaint and, where possible, provide a resolution for the issues, fully document the complaint process, and provide a detailed report to the GFSI Senior Technical Manager. The GFSI Senior Technical Manager will then forward the final report to the GFSI Director.

6. Sanctioning

The ability to sanction a GFSI-recognised CPO within the GFSI framework serves to uphold the integrity of the GFSI recognition process by addressing cases of non-alignment with the GFSI Benchmarking Requirements, GFSI Governance Rules and Ethical Code of Conduct or GFSI CPO agreement.

Findings of non-alignment may arise through:

1. GFSI's Monitoring of Continued Alignment,
2. GFSI initiated investigations into reportable incidents,
3. Complaints data (external).

The Certification Programme Owner will be informed of the findings identified by GFSI as breaches of alignment with the Benchmarking Requirements, GFSI Governance Rules and Ethical Code of Conduct or GFSI CPO agreement. The Certification Programme Owner shall take action to respond to the findings appropriately with a corrective and preventive action plan, taking into account root causes for a timely resolution. This shall be initiated by the recognised CPO and agreed with the GFSI team.

If the corrective action plan provided is deemed unsatisfactory and the issue cannot be adequately resolved to GFSI's satisfaction, the breaches of alignment shall then be referred to the GFSI Technical Sub-Committee for sanctioning consideration.

The Certification Programme Owner will be notified at least 5 working days before the scheduled sanctioning meeting. A report compiled by the GFSI technical team detailing the breaches of alignment and anonymised to ensure impartiality, will be presented to the Technical Sub-Committee by the GFSI Director. The Technical Sub-Committee may ask for further information before moving to take a sanctioning decision. The available options open to the Technical Sub-Committee are;

1. Take no action against the Certification Programme Owner.
2. Maintain recognition but require evidence of realignment.
3. Suspend recognition
4. Withdraw recognition.

In the event that the sanctioning decision made by the Technical Sub-Committee is suspension of recognition or withdrawal of recognition, a recommendation must be made by the Technical Sub-Committee to all GFSI Steering Committee Members for a vote. 75% of the Steering Committee

members must vote in favour of the recommendation for sanctioning for the decision to be carried and the sanction imposed.

The Certification Programme Owner will be informed of the sanctioning decision immediately in writing setting out the basis for the decision, the conditions imposed and any action for remediation with timelines.

GFSI Withdrawal of Recognition

If the GFSI Steering Committee considers that a withdrawal of recognition is required, the GFSI Director will formally inform the Certification Programme Owner of this decision.

In the event that GFSI recognition is withdrawn, GFSI will issue a news release via the GFSI website which will clearly specify the details and conditions of the withdrawal.

A Certification Programme Owner may choose to voluntarily withdraw from GFSI recognition when circumstances place the Certification Programme into a situation whereby they can no longer align with GFSI requirements, Governance Rules and Ethical Code of Conduct or the terms of the GFSI CPO agreement. In this instance, the Certification Programme Owner shall make a request to withdraw voluntarily from GFSI recognition to the GFSI Director in writing in line with the terms of the GFSI CPO agreement.

GFSI Suspension of Recognition

If the GFSI Steering Committee considers that a period of suspension of recognition is required, the GFSI Director will formally inform the Certification Programme Owner of the decision and period of the suspension, and any remediation conditions imposed by the GFSI Steering Committee to regain recognition status. GFSI will issue a news release via the GFSI website which will clearly specify the details and conditions of the suspension.

The Certification Programme Owner shall confirm to the GFSI Steering Committee that these remediation conditions can be achieved within the timescales set out by the GFSI Steering Committee, when evidence of the implementation of the corrective actions will be expected, and alignment to the GFSI Benchmarking Requirements can be re-established.

A suspension period may be extended to a maximum of 12 months from the date the initial suspension occurred.

In the event that the GFSI Steering Committee is not satisfied with the progress made by the Certification Programme Owner or their commitment to address any of their requirements, they may withdraw recognition of the Certification Programme.

GFSI Appeals Procedure

The Certification Programme Owner has the right to appeal against any sanction outcome imposed by the GFSI Steering Committee. All appeals must be heard.

The Certification Programme Owner shall submit an appeal to the GFSI Director within 30 working days of the notification of the sanction having been received. The appeal shall be submitted in writing and shall clearly describe the reason for the appeal and provide a full explanation together with evidence to support the appeal that the sanction outcome is not reasonable / proportionate.

When the appeal procedure is initiated, in the event the appeal is against a sanction of suspension or withdrawal of recognition, the status of the Certification Programme shall be amended on the GFSI website to reflect the fact that the sanctioning decision has been appealed by the Certification Programme Owner.

Any appeal shall be heard by an independent Appeals Committee, which is a body specifically assembled for the purposes of hearing an individual appeal. The GFSI Director shall oversee the appeal process to ensure it is conducted in an impartial and professional manner, and without any actual or perceived conflict of interest, in line with GFSI Governance rules but has no role to play in the process of appeal itself. The GFSI Director shall formally inform the Certification Programme Owner of the outcome of the appeal. The decision of the Appeals Committee is final. The outcome of the appeal will be communicated on the GFSI website in the event of the appeal being against a suspension or withdrawal of recognition.

Appendix 1 – Work Plan

GATE	STEP	TYPICAL TIMELINE	AGREED DEADLINE	SUPPORTING DOCUMENTS
A. Appli- cation	1 – The Certification Programme Owner downloads the application form from mygfsi.com, completes it and sends it and any required supporting documents to gfsibm@theconsumergoodsforum.com			GFSI Application form
	2 – GFSI sends an invoice for the application fee; process progresses when the invoice is paid.	1 week		
	3 – GFSI reviews the application and confirms within 2 weeks of receipts if the application is accepted.	2 weeks		
	4 – A contract is signed between GFSI and the Certification Programme Owner GFSI appoints a Benchmark Leader	2 week		GFSI Benchmarking contract
	5 – A workplan is agreed between the Certification Programme Owner and the appointed Benchmark Leader.	1 week		GFSI Workplan
B. Desktop Review	1 – GFSI sends Self-Assessment form(s) for Part II and the scope(s) included in the application form.	1 week		GFSI Self-Assessment forms
	2 – The Certification Programme Owner completes the Self-Assessment form(s) and submits them to the Benchmark Leader and GFSI with supporting evidence.	3 months		GFSI Self-Assessment forms
	3 – The Benchmark Leader reviews the completed self-assessment and supporting documents: The information is complete and allows a comprehensive review by the Benchmark Leader – the Benchmark Leader sends the self-assessment with their assessment and comments, move to step 4;	4 weeks		GFSI Self-Assessment forms

GATE	STEP	TYPICAL TIMELINE	AGREED DEADLINE	SUPPORTING DOCUMENTS
B. Desktop Review	The information is incomplete, and/or the evidence provided is insufficient – the Benchmark Leader sends feedback to the Certification Programme Owner, back to step 2.			
	4 – The findings of the self-assessment review are discussed and clarified through a call with the Benchmark Leader, GFSI, and Certification Programme Owner.	2 hours		GFSI Self-Assessment forms
	5 – The Certification Programme Owner updates (where applicable) and sends the final Self-Assessment forms and additional supporting documents to the Benchmark Leader.	2 weeks		GFSI Self-Assessment forms
	6 – The Benchmark Leader reviews the additional information provided: - information is complete and addressing the findings would not require a significant re-write of the programme – the Benchmark Leader sends the final validation of the self-assessments and a completed list of findings to the Certification Programme Owner and GFSI, move to “office visit”; - addressing the findings would require a significant re-write of the programme - the Benchmark Leader sends the final validation of the self-assessments and a completed report including the list of findings to the Certification Programme Owner and GFSI, move to G; - information is incomplete or unclear – back to step 5.	3 weeks		GFSI Self-Assessment forms

GATE	STEP	TYPICAL TIMELINE	AGREED DEADLINE	SUPPORTING DOCUMENTS
C. Office Visit	1 – The Benchmark Leader and the Certification Programme Owner plan a visit to the nominated offices of the Certification Programme Owner: - The date is agreed upon based on availability. - The Benchmark Leader sends a proposed agenda.	2 weeks before the visit		GFSI office visit agenda
	2 – The office visit happens at the Certification Programme Owner's main office: - The Benchmark Leader completes the final list of findings and presents it to the Certification Programme Owner; - The Certification Programme Owner representative signs the list of findings; A copy of the signed list of findings is left with the Certification Programme Owner, another copy is sent to GFSI.	1.5 to 3 working days		GFSI office visit checklist GFSI List of findings
D. Corrective Action Plan and reporting	1 – The Certification Programme Owner sends the Benchmark Leader a corrective action plan to address any findings raised during the assessment.	4 weeks		GFSI List of findings
	2 – The Benchmark Leader reviews the corrective action plan: - The corrective actions address the findings – the Benchmark Leader accepts the corrective action plan, move to step 3; - Some of the corrective actions do not address the findings – the corrective action plan is rejected, back to step 1.			GFSI List of findings
	3 – The Benchmark Leader completes the assessment report: - the Benchmark Leader sends the assessment report including the list of findings to the Certification Programme Owner - the Certification Programme Owner confirms that the content of the report is accurate.			GFSI Assessment Report
	4 – GFSI validates the finally agreed report and action plan: - The Benchmark leader sends the final report agreed with the Certification Programme Owner to GFSI; - GFSI reviews the report and validates its content.	1 week		GFSI List of findings

GATE	STEP	TYPICAL TIMELINE	AGREED DEADLINE	SUPPORTING DOCUMENTS
E. Public Stake- holder Consul- tation	1 – GFSI prepares the documentation for public consultation, this includes - An announcement statement; - The assessment report with the corrective action plan; - The completed and reviewed self-assessments.	1 week		Assessment Report Self-Assessment forms
	2 – The Certification Programme Owner reviews the proposed documentation for the public consultation: - The Certification Programme Owner approves the documentation: move to step 3; - The Certification Programme Owner has concerns over the content of the report, they submit their suggested changes to GFSI, back to step 1.	1 week		GFSI Assessment Report GFSI Self-Assessment forms
	3 – GFSI makes the approved documentation available for stakeholder consultation on mygfsi.com for four weeks.	4 weeks		GFSI Public Consultation comment form
	4 – GFSI closes the public consultation and sends the list of received comments to the Certification Programme Owner and the Benchmark Leader.	1 week		

GATE	STEP	TYPICAL TIMELINE	AGREED DEADLINE	SUPPORTING DOCUMENTS
F. Completion of corrective actions	1 – The Certification Programme Owner completes all required corrective actions and: - answers to any comments from the public consultation requiring an action or comment; - provides evidence of implementation for all corrective actions for the findings of the assessment; - The Certification Programme Owner sends the final report with their above addition, and any required supportive documents, to the Benchmark Leader.	Depending on corrective actions		GFSI Assessment Report
	2 – The Benchmark Leader reviews the answers from the Certification Programme Owner to the comments and findings of the assessments: - The Benchmark Leader accepts the comments and completion of the corrective actions from the Certification Programme Owner – move to G; - The Benchmark Leader rejects the comments and evidence of completion of corrective actions from the Certification Programme Owner – back to step 1.	2 weeks		GFSI Assessment Report
	3 – The Benchmark Leader sends the final assessment report with the completed corrective actions to GFSI: - GFSI accepts the completed corrective actions: move to G - GFSI rejects the completed actions and/or asks for more information: back to step 1.	1 week		GFSI Assessment Report

GATE	STEP	TYPICAL TIMELINE	AGREED DEADLINE	SUPPORTING DOCUMENTS
G. GFSI Final Recognition Decision and Communication	1 – The Benchmark Leader sends the final assessment report, including the executive summary with their recommendation for recognition, to GFSI.	3 months after the public consultation maximum		GFSI Assessment Report
	2 – GFSI reviews the final assessment report: - GFSI accepts the recommendation from the Benchmark Leader: move to step 3; - GFSI challenges the recommendation from the Benchmark Leader: feedback is sent to the Benchmark Leader for consideration, back to step 1;	1 week		GFSI Assessment Report
	3 – GFSI submits the summary report to the GFSI Steering Committee who votes. The Certification Programme Owner recognition status is based on the majority vote.	2 weeks		GFSI Assessment Report
	4 – GFSI informs the Certification Programme Owner of the final decision and confirms next step: - The Certification Programme Owner agrees to communicate publicly the result of their assessment – move to step 5. - The Certification Programme Owner does not want the result of their assessment publicly communicated – move to step 6. In either case, GFSI posts a signed statement of alignment to the Certification Programme Owner.	1 week		GFSI Statement of Alignment
	5 – GFSI and the Certification Programme Owner agree a common news release text and publish this jointly on their respective media. Move to step 6.	2 weeks		
	6 – GFSI updates mygfsi.com and ensures the Certification Programme Owner updates their own website when applicable.			

GATE	STEP	TYPICAL TIMELINE	AGREED DEADLINE	SUPPORTING DOCUMENTS
H. Monitoring of continued alignment	1 – Once a year, the Certification Programme Owner completes a monitoring record and sends this to GFSI and the Benchmark Leader.			GFSI Monitoring Record
	2 – The Benchmark Leader and the Certification Programme Owner schedule the required activities of the monitoring of continuous alignment.			
	3 – The Benchmark Leader carries out the first record review and the gap analysis with the Certification Programme Owner.			GFSI Monitoring Checklist
	4 – The Benchmark Leader carries out an office visit.			GFSI Monitoring Checklist
	5 – The Benchmark Leader carries out a second record review.			GFSI Monitoring Checklist
	6 – The Certification Programme Owner and Benchmark Leader ensure that an acceptable corrective action plan is completed for any findings from the monitoring activities. If any findings raise concerns on the recognition status of the Certification Programme Owner, the sanctioning process may be initiated.	CAP submitted within 4 weeks of office visit		GFSI Monitoring Checklist
	7 – GFSI validates that the results justify maintaining the Certification Programme Owner recognition. If any findings raise concerns GFSI recommends next steps to the GFSI Steering Committee.			GFSI Monitoring Checklist