



**GFSI** TECHNICAL EQUIVALENCE REQUIREMENTS  
GFSI GUIDANCE DOCUMENT VERSION 7.2

# PART I - THE TECHNICAL EQUIVALENCE PROCESS

# Part I - The Technical Equivalence Process

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# INTRODUCTION

The Global Food Safety Initiative (GFSI) works closely together with stakeholders to provide continuous improvement in Food Safety Management Systems to ensure confidence in the delivery of safe food to consumers worldwide. We have used this input to develop the V7.2 assessment criteria and adopt a new approach towards our technical equivalence procedure. We seek to increase transparency and streamline the technical equivalence procedure, thus enabling applicants to efficiently comply with the criteria laid out in the GFSI Technical Equivalence Requirements V7.2. It will contribute to the following GFSI objectives:

1. Reduce food safety risks by delivering equivalence and convergence between effective food safety management systems
2. Manage cost in the global food system by eliminating redundancy and improving operational efficiency
3. Develop competencies and capacity building in food safety to create consistent and effective global food systems
4. Provide a unique international stakeholder platform for collaboration, knowledge exchange and networking

The technical equivalence is an acknowledgment of the equivalence of the content of the regulation / law and codes of practice to the relevant scope(s) of GFSI Technical Equivalence Requirements (Part III). The technical equivalence does not include an assessment of the management of the regulation / law and codes of practice, unlike the Benchmarking Requirements process, which is used to assess private Certification Programme Owners (CPOs).

This section is the first part of the GFSI Technical Equivalence Requirements V7.2, which have been developed and published by the Global Food Safety Initiative. It specifies the requirements for the GFSI technical equivalence acknowledgement of regulation / law and codes of practice. The detailed steps and procedures developed by GFSI serve to demonstrate that the GFSI technical equivalence process is carried out in an impartial and transparent manner by a technically competent Technical Equivalence Leader under the supervision of the GFSI Technical Manager.

The objective of this document is to give stakeholders

a clear insight into the assessment process against the GFSI Technical Equivalence Requirements. Further clarification will be provided during the application process. The technical equivalence process carried out by GFSI is the method by which a regulation / law and codes of practice are objectively compared to the GFSI Technical Equivalence Requirements.

GFSI shall ensure that the GFSI technical equivalence process and associated procedures are transparent. The systems and procedures associated with the GFSI technical equivalence process will be reviewed, maintained and updated to ensure consistency and integrity.

# 1 APPLICATION

Any applicants must apply via the GFSI website. After requesting login details, the applicant will be able to download an application form template and find detailed guidance for the preparation of the application and supporting documents. The application must include GFSI technical equivalence for at least one industry scope as defined in Technical Equivalence Requirements (Part III).

The GFSI Technical Manager shall review the application, and if in agreement, shall send a Memorandum of Understanding (MoU) to cover all aspects of the technical equivalence process as well as terms and conditions.

The GFSI Technical Manager reserves the right to reject or refer an application back to the applicant if the quality of the application is poor.

An applicant shall be permitted to lodge multiple technical equivalence applications with GFSI, but shall only be permitted to submit one re-submission within a twelve-month period, if the initial application is deemed to be unsuccessful.

A list with available technical equivalence leaders will

be presented on the GFSI website. The GFSI Technical Manager will appoint a Technical Equivalence Leader for the applicant and record the selection in the application file. The GFSI Technical Manager may assign additional technical equivalence leaders to ensure that the technical equivalence takes place within the desired timeframe. This will be done with the written consent of the applicant.

The technical equivalence process will only progress once the GFSI Technical Manager accepts the application and the MoU has been signed between the applicant and GFSI.

After the signed MoU is received, the GFSI Technical Manager shall transfer all appropriate self-assessment documents and templates to the successful applicant. A work plan of activities and key dates will be agreed upon between the GFSI Technical Manager, the Technical Equivalence Leader and the applicant based on the number of scopes and volume of documentation submitted.

The confirmation of the acceptance of the work plan shall be published on the GFSI website.

## 1.1 GFSI Scopes of Acknowledgement

### 1.1.1 Defining the Scope

Every applicant shall have a defined scope in relation to food safety or services directly associated with food safety.

GFSI has clearly defined scopes in relation to products or services for which applicants can seek technical equivalence. These are categorised into sectors and sub-sectors for which there are a defined series of relevant requirements for food safety criteria. The applicant shall clearly specify the scope(s) relevant to their regulation / law and codes of practice concerned by their application to GFSI. The applicant's regulation / law and codes of practice shall be assessed against the requirements of the relevant scopes of the GFSI Technical Equivalence Requirements.

Regulation / law and codes of practice may have a major focus or historical focus other than those related to food safety. Only those requirements relating to food safety shall be assessed by GFSI.

The GFSI sector and sub-sector scopes for acknowledgement are as follows:

GFSI SCOPE OF ACKNOWLEDGEMENT (TECHNICAL EQUIVALENCE CATEGORY CODE)	TECHNICAL EQUIVALENCE CATEGORY NAME	EXAMPLES OF PRODUCTS / SERVICES AND METHOD OF PRODUCTION
AI	Farming of Animals for Meat / Milk / Eggs / Honey	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)
AII	Farming of Fish and Seafood	Fish and seafood used for meat production Growing, trapping and fishing (slaughtering at point of capture)
BI	Farming of Plants (other than grains and pulses)	Growing or harvesting of plants (other than grains and pulses) for food
BII	Farming of Grains and Pulses	Growing or harvesting of grains and pulses for food
C	Animal Conversion	Lairage, slaughter, evisceration, bulk chilling, bulk freezing of animals Gutting, bulk freezing of fish Storage of game
D	Pre-process handling of plant products, nuts and grain	De-shelling of nuts Drying of grain Grading of fruit and vegetables Storage
E I	Processing of perishable animal products	Production of animal products including fish and seafood Meat, eggs, dairy and fish products Deboning, cutting, washing, trimming, grading, pasteurisation, cooking, curing, fermentation, smoking, chilling, freezing, packed in modified atmosphere, packed in vacuum packing
E II	Processing of perishable plant products	Production of plant products (products including grains, nuts, and pulses) Washing, slicing, dicing, cutting, shredding, peeling, grading, pasteurisation, cooking, chilling, juicing, pressing, freezing, packed in modified atmosphere, packed in vacuum packing or any other activity that significantly transforms the product from its original whole state
E III	Processing of perishable animal and plant products (mixed products)	Production of animal and plant products Mixing, cooking, chilling, freezing, packed in modified atmosphere, packed in vacuum packing

<b>E IV</b>	Processing of ambient stable products	Production of food products from any source that are stored and sold at ambient temperature Aseptic filling, baking, bottling, brewing, canning, cooking, distilling, drying, extrusion, fermentation, freeze drying, pressing, frying, hot filling, irradiating, milling, mixing and blending, packed in modified atmosphere, packed in vacuum packing, pasteurising, pickling, roasting, salting and refining
<b>FI</b>	Production of feed	Production of feed from a single or mixed food source Drying, cooking, milling, mixing and blending and extrusion
<b>G</b>	Catering / Food Service	Production of food products from any source for consumption outside the home Cooking, mixing and blending, preparation of component products
<b>H</b>	Retail / Wholesale	Provision of finished food and feed products to a customer Retailing and wholesaling of food and feed
<b>I</b>	Provision of Food Safety Services	Supply of services related to the safe production of food Water Supply Pest Control Cleaning Services Test Laboratories
<b>J</b>	Provision of Storage and Distribution Services Food and Feed	Storage facilities for food and feed Distribution vehicles for food and feed
<b>K</b>	Manufacture of Food Processing Equipment	Production of food and feed processing equipment
<b>L</b>	Production of (Bio) Chemicals (Additives, Vitamins, Minerals, Bio-cultures, Flavourings, Enzymes and Processing aids)	Production of food and feed additives, vitamins, minerals, bio-cultures, flavourings, enzymes and processing aids
<b>M</b>	Production of Food Packaging	Production of food and feed packaging, 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.
<b>N</b>	Food Broker / Agent	The supply of finished food and feed products

## 1.2 Technical Equivalence Options

### 1.2.1 First Request for Technical Equivalence

The requirements specified within this clause shall apply to applicants, which have:

- not previously undergone technical equivalence.
- been assessed previously, but have withdrawn the application without completing the technical equivalence process.
- been previously acknowledged by GFSI, but are now no longer acknowledged by GFSI.

GFSI will require the applicant to submit an application for GFSI technical equivalence acknowledgement to the GFSI Technical Manager together with supporting evidence that:

- the applicant's regulation / law and codes of practice shall not be undergoing a significant change (see criteria for significant change in glossary)

and

- the applicant's regulation / law and codes of practice shall not have any practices that are deemed as restricting access to markets

and

- the applicant has undertaken a self-assessment to validate that the food safety requirements in their regulation / law and codes of practice comply with the GFSI Technical Equivalence Requirements.

### 1.2.2 Re-assessment for Technical Equivalence

The requirements specified within this clause of the GFSI Technical Equivalence Requirements shall apply to:

- Applicants that have successfully undergone technical equivalence by GFSI. All GFSI-acknowledged regulation / law and codes of practice must apply for re-assessment against a new version of the GFSI Technical Equivalence Requirements within nine months of publication. The GFSI Board has the authority to extend this period under special circumstances
- the applicant's regulation / law and codes of

practice shall not be undergoing a significant change at the time of application for GFSI technical equivalence acknowledgement.

### 1.2.3 Significant Change after Technical Equivalence V7.2

An applicant seeking continued GFSI technical equivalence acknowledgement prior to a change is defined as an applicant who is already acknowledged by GFSI for technical equivalence based on GFSI Technical Equivalence Requirements V7.2 but will be making a change to its programme, which could compromise the applicant's acknowledgement by GFSI.

In such cases, the applicant will inform the GFSI Executive Director in writing about the significant change. A significant change can lead to additional actions from the Technical Equivalence Leader. The type of action will depend on the impact of the significant change.

GFSI will require the applicant to submit an application to check the changes made.

## 2 THE GFSI TECHNICAL EQUIVALENCE METHODOLOGY

### 2.1 Introduction

The technical equivalence process is performed by the Technical Equivalence Leader. They are selected and approved by the GFSI Board to ascertain whether a potential applicant can demonstrate conformity with the GFSI Technical Equivalence Requirements. The Technical Equivalence Leader will execute the technical equivalence process as described in this document under supervision of the GFSI Technical Manager. They will report to the GFSI Technical Manager who will supervise all the assessment activities and communication with the applicants. All technical equivalence leaders undergo the same initial training and harmonisation activities several

times a year to maintain alignment in their evaluation approaches.

GFSI will confirm the Technical Equivalence Leader assigned to the applicant after signing an impartiality declaration between the applicant and the Technical Equivalence Leader. A Technical Equivalence Leader may perform technical equivalence activities for a maximum period of 3 years per applicant.

The GFSI Executive Director may reassign the Technical Equivalence Leader at any time, at his or her discretion, if it is deemed necessary to do so.

### 2.2 The Key Procedural Steps

The technical equivalence process shall be carried out in accordance with the following key procedural steps:

1. Applicant self-assessment
2. Preliminary desk review of the self-assessment by the Technical Equivalence Leader
3. Call to go through findings
4. Update and Communication of the Final Self-Assessment
5. Public stakeholder consultation
6. GFSI Board final decision and communication.

include:

2. Whether the GFSI criterion is covered in the assessed regulation / law and codes of practice.
3. The name of the regulation / law and codes of practice covering the criterion with reference to the exact page and the paragraph.
4. The relevant regulation / law and codes of practice as objective evidence.

Along with the application material provided to the applicants, GFSI will also provide a detailed description of what is expected from the applicants throughout the process.

#### 2.2.1 Step 1: Applicant Self-Assessment

The objective of the self-assessment is to allow the applicant to demonstrate that the regulation / law and codes of practice cover all the requirements listed in Technical Equivalence Requirements (Part III).

1. The GFSI Technical Manager provides a template for each relevant scope that the applicant may use to rate themselves against the GFSI Technical Equivalence V7.2 assessment criteria. For each criterion, the applicant's assessment needs to

#### 2.2.2 Step 2: Preliminary Desk Review of the Self-Assessment

After the completed self-assessment is received, the Technical Equivalence Leader, under the supervision of the GFSI Technical Manager, performs a preliminary desk review.

For each GFSI criterion, the Technical Equivalence Leader reviews the corresponding requirements in the applicant's regulation / law and codes of practice and checks the reference given by the applicant on where it is covered. The Technical Equivalence Leader



assesses the objective evidence delivered by the applicant.

The Technical Equivalence Leader will take note of any criteria where additional information is needed and where they do not agree with the rating from the applicant. These comments need to be supported by comprehensive explanations. All these findings are sent back to the applicant in writing and form the basis of step 3.

### **2.2.3 Step 3: Call to Go Through Findings**

In a conference call, the Technical Equivalence Leader and the GFSI Technical Manager will exchange their findings in detail with the applicant. This will give the applicant greater insight into any required additional information or adjustment to the application. During the conference call, the timeframe for execution of actions will be agreed.

### **2.2.4 Step 4: Update and Communication of the Final Self-Assessment**

Within the agreed timeframe, the applicant sends the revised and final self-assessment form. To limit a possible back-and-forth exchange of information the applicant is required to deliver the requested information and adjustments into one final Self-Assessment, signed off by the legal representative of the applicant.

### **2.2.5 Step 5: Public Stakeholder Consultation**

The spreadsheet with the findings and the Technical Equivalence Leader's report are made available by the GFSI Technical Manager on the GFSI website for stakeholder consultation for a period of four weeks. The applicant is given the opportunity to approve the content of the report before it is made available in the public domain. The report is only put to consultation once agreed by all above parties.

If there are any comments, the GFSI Technical

Manager collects any observations or objections made by stakeholders and shares them with the applicant, who must address these points. The Technical Equivalence Leader and the GFSI Technical Manager evaluates every response from the applicant and informs the GFSI Board in the form of a final summary report previously agreed upon with the applicant.

### **2.2.6 Step 6: GFSI Board Final Decision and Communication**

The GFSI Board comes to a decision based on consensus following the recommendation that is presented by the Technical Equivalence Leader and the GFSI Technical Manager. If a vote is necessary, the votes of the majority of a quorum of the GFSI Board shall determine the final decision. Records are kept of the numbers of votes for, against and abstaining. The GFSI Executive Director communicates the Board decision to the applicant in writing as soon as is practicable after the GFSI Board decision. The Board decision is also published on the GFSI website. The GFSI Technical Manager ensures that those stakeholders who submitted comments during the stakeholder consultation receive feedback.

In the event of acknowledgement by the GFSI Board, the GFSI Technical Manager prepares a news release confirming this decision with the co-operation of the applicant. The applicant will be expected to issue a similar news release. The timing of these announcements shall be agreed on by the GFSI Executive Director and the applicant.

The GFSI Technical Manager shall publish the confirmation of acknowledgement on the GFSI website.

If the final decision of the GFSI Board is non-acknowledgement, the GFSI Technical Manager must clearly communicate and document the reasons for this decision to the applicant. The applicant has the right to appeal against the GFSI Board decision. The appeal is undertaken in accordance with the procedures specified in the applicant's agreement.

## **2.3 Complaint Investigation**

If the GFSI Technical Manager receives a complaint or report regarding the non-conformity of a regulation / law and codes of practice with the GFSI Technical Equivalence Requirements, the GFSI Technical Manager promptly acknowledges receipt of the com-

plaint or report to the party concerned, in writing. When a complaint is received, the GFSI Technical Manager initiates investigative procedures to verify the accuracy of the complaint.

In the event of a serious complaint towards a GFSI-acknowledged regulation / law and codes of practice, the GFSI Technical Manager has the right to investigate the complaint. This can be done by a desktop investigation or an office visit. The GFSI Technical Manager is responsible for the investigation of any complaints or suspected non-conformity of a GFSI-acknowledged regulation / law and codes of practice with the requirements specified within the GFSI Technical Equivalence Requirements.

The GFSI Technical Manager must 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 is

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 can be appropriately authenticated. A Technical Equivalence Leader or an independent assessor may be appointed at any stage during the investigation process at the discretion of the GFSI Technical Manager. The GFSI Technical Manager must ensure impartiality and preserve confidentiality.

If a Technical Equivalence Leader or an assessor is appointed, he or she carries out a thorough investigation of the complaint, provides a resolution for the issues whenever possible, fully documents the complaint process, and provides a detailed report to the GFSI Executive Director.

## 2.4 Sanctioning

Complaints may lead to sanctions for the applicant. If there is evidence of non-conformity against the GFSI Technical Equivalence Requirements the GFSI Executive Director shall promptly contact the applicant concerned.

The GFSI Technical Manager shall fully document the process of investigation and decision-making. The GFSI Technical Manager shall make a decision after the review of the submitted evidence and will either:

1. take no action against the applicant

or

2. convene a meeting of GFSI Board members to gain agreement on one of three possible outcomes: continued acknowledgement, suspension of acknowledgement, or the withdrawal of acknowledgement.

Irrespective of the decision taken by the GFSI Executive Director, the applicant and the GFSI Board members are informed in writing of the decision with a full explanation for the actions taken.

### 2.4.1 GFSI Suspension of Acknowledgement Procedure

If the GFSI Board considers that a period of suspension of acknowledgement should be imposed following consultation with the applicant and review of the evidence gathered and submitted by the GFSI Technical Manager, the applicant is informed of this decision. The applicant will be informed of any

remediation conditions imposed by the GFSI Board to regain acknowledgement status, the period of suspension of acknowledgement and expected outcomes.

The applicant must confirm to the GFSI Board whether these remediation conditions can be achieved within the timescales set out by the GFSI Board. They must also confirm when evidence of the corrective actions can be expected and when continued conformity to the requirements of the GFSI Technical Equivalence Requirements can be established.

If the GFSI Board is not satisfied with the commitment of the applicant under suspension to take the appropriate corrective actions, they may withdraw acknowledgement.

If a period of suspension is imposed, the GFSI website shall clearly state the details and conditions of the suspension.

### 2.4.2 GFSI Withdrawal of Acknowledgement Procedure

If the GFSI Board considers that a withdrawal of acknowledgement is required following consultation with the applicant and review of the evidence submitted by the GFSI Executive Director, the applicant is informed of this decision.

If GFSI acknowledgement is withdrawn, GFSI issues a news release and the GFSI website must clearly state the details and conditions of the withdrawal.

An applicant may choose to voluntarily withdraw from GFSI acknowledgement when unforeseen circumstances put the applicant into contravention of GFSI Technical Equivalence Requirements. In this instance, the applicant will make a request to withdraw voluntarily, with a full dossier of the circumstances to the GFSI Executive Director.

The GFSI Executive Director will inform the GFSI Board of the circumstances and convene a meeting to discuss the issue as soon as possible. The GFSI Board grants voluntary withdrawal or launches the suspension process at their discretion.

## **2.5 GFSI Appeals Procedure for Technical Equivalence Acknowledgement**

The applicant has the right to appeal against any decision made by the GFSI Board, the GFSI Executive Director or any person contracted to GFSI in relation to the technical equivalence process, associated systems and procedures. Only the applicant to which the decision relates has the right to appeal to the GFSI Board.

The applicant must submit an appeal to the GFSI Executive Director within 30 days of the matter in dispute occurring. The appeal needs to be submitted in writing to the GFSI Executive Director, clearly describing the reason and with a full explanation and substantive evidence to support the thorough investigation of the appeal.

When the appeal procedure is initiated, the status of the GFSI acknowledgement shall be amended on the GFSI website to reflect that the applicant is subject to an appeal.

The GFSI Board will assemble an Appeals Committee specifically for the hearing of an individual appeal. The Appeals Committee is assembled from members of the GFSI Board and consists of a minimum of three Board members. The GFSI Board ensures that such an Appeals Committee does not include any person or GFSI staff member involved with the decision that is being appealed. The GFSI Board ensures that the investigation is conducted in an impartial and professional manner, and without any actual or perceived conflict of interest.

The outcome of the investigation by the Appeals Committee is heard by the GFSI Board, and the decision made by the Appeals Committee is upheld by the GFSI Board.

The decision submitted to the GFSI Board by the Appeals Committee is conveyed to the applicant that has raised the appeal. The decision of the Appeals Committee is final. When the decision is given the appeal process is closed.