



GFSI TECHNICAL EQUIVALENCE
GFSI GUIDANCE DOCUMENT VERSION 7.2

PART III - *N* **FOOD BROKER / AGENT**

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Certification Programme Scope and Key Elements

This section is the third part of the GFSI Benchmarking Requirements, which has been developed and published by the Global Food Safety Initiative (GFSI) to specify the requirements for the recognition of food safety Certification Programmes.

The objective of **Part III – N – Food Broker/Agent** is to define:

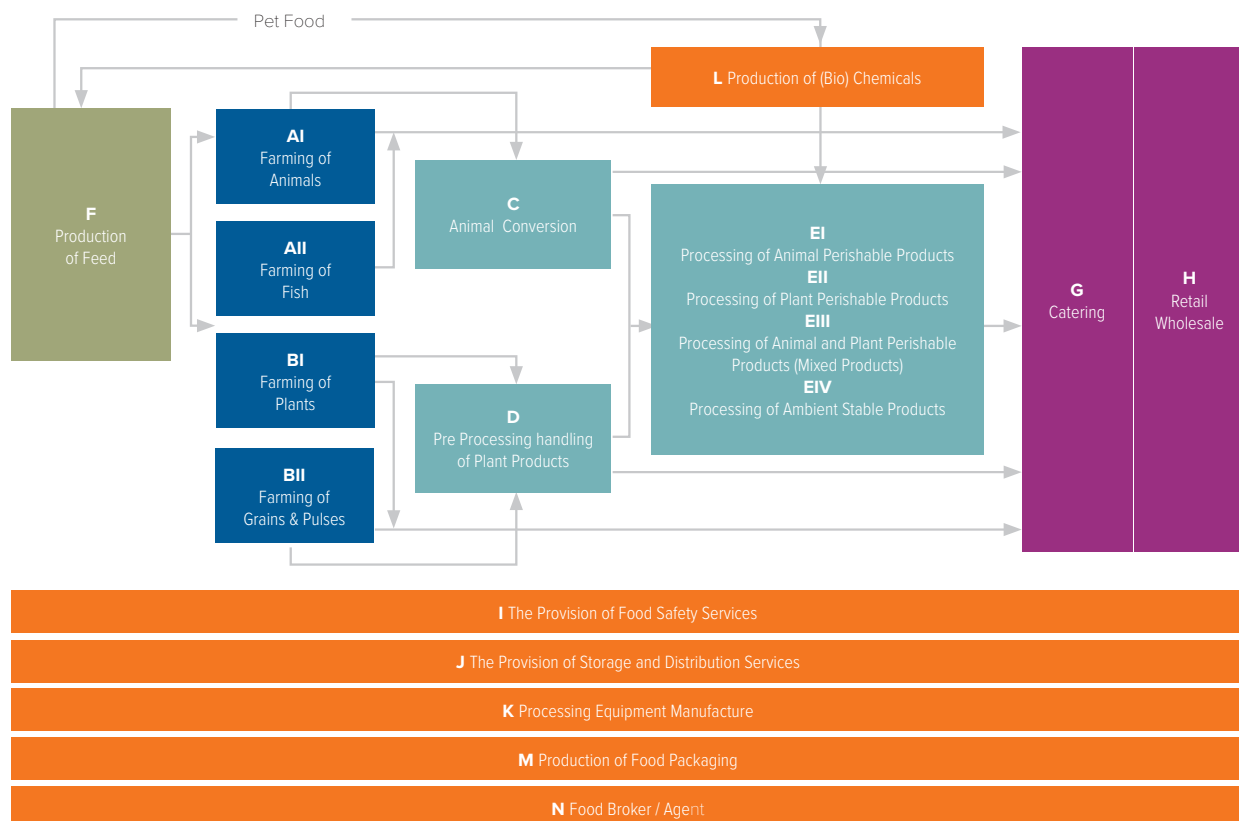
- the requirements for the Food Safety Management Systems to be in place in the Certification Programme's standard for GFSI scope of recognition **N – Food Broker/Agent**,
- the requirements for Hazard Analysis and Critical Control Points (HACCP) or HACCP based requirements to be in place in the Certification Programme's standard for GFSI scope of recognition **N – Food Broker/Agent**.

GFSI scope of recognition **N – Food Broker/Agent** includes the following products, services, or methods of production:

- the trading of food and feed products

It excludes the production, storage and any physical handling of the product. These activities are included in scopes A, B, C, D, E, J, L and M of the GFSI Benchmarking Requirements.

GFSI has worked closely with food industry experts to clearly define the requirements that shall be in place to provide food safety assurance in specific sectors of the food industry and for organisations providing services to the food industry. Although the principles are the same, these requirements differ from sector to sector of the food supply chain.



A Certification Programme's standard and other guidance shall provide sufficient detail to ensure that the GFSI requirements in the following tables are met and that, within the benchmarking process, objective evidence of compliance can be found. The requirements for individual Certification Programme standards must be independently developed based on industry practice and it is not expected that a Certification Programme's standard shall be a direct copy of the GFSI requirements.

GFSI expects all benchmarked Certification Programmes to meet the Food Safety Management, Good Industry Practice, and HACCP requirements for the applicable sectors outlined in Part III.

However, Certification Programmes requiring Certification Bodies to operate to ISO / IEC 17021-1 must also

ensure that they meet or exceed the requirements of ISO 22000.

For those Certification Programmes, where there is any divergence between the requirements of the GFSI Benchmarking Requirements and ISO 22000, the requirements of ISO 22000 shall prevail.

Certification Programmes requiring Certification Bodies to operate to ISO / IEC 17065 shall meet the requirements for applicable sectors outlined in Part III.

The following sections and tables identify the GFSI requirements for this scope. Certification Programme Applicants must ensure that all requirements are considered for all scopes included in the application. This may include requirements from more than one Part III document.

SECTION 1: HACCP OR HAZARD BASED REQUIREMENTS

Table I: HACCP Requirements

SECTION 2: FOOD SAFETY MANAGEMENT REQUIREMENTS

Table I: Food Safety Management Requirements

SECTION 1: HACCP OR HAZARD BASED REQUIREMENTS

Table I: HACCP REQUIREMENTS

CLAUSE NUMBER	CLAUSE NAME	REQUIREMENTS
HACCP N 1	Hazard and Risk Management System	The standard shall require that the agent / broker has in place a Hazard and Risk Management System for the activities under their responsibility. This may be a HACCP based system or another hazard and risk management system that covers the Codex Alimentarius HACCP principles.

SECTION 2: FOOD SAFETY MANAGEMENT REQUIREMENTS

Table I: Food Safety Management Requirements

CLAUSE NUMBER	CLAUSE NAME	REQUIREMENTS
FSM N 1	Food safety management general requirements	The standard shall require that the elements of the agent / broker's Food Safety Management System be documented, implemented, maintained and continually improved.
FSM N 2	Food safety policy	The standard shall require the agent / broker to have a clear, concise and documented food safety policy statement and measurable objectives specifying the extent of the agent / broker's commitment to meet the safety needs of its products.
FSM N 3	Food safety manual	The standard shall require the agent / broker to have a food safety manual or documented system having a scope appropriate to the range of business activities to be covered, including documented procedures or specific reference to them.
FSM N 4	Management responsibility	The standard shall require that the agent / broker establishes a clear organisational structure, which unambiguously defines and documents the job functions and responsibilities of at least those employees whose activities affect food safety.
FSM N 5	Management commitment	The standard shall require that the agent / broker's senior management provides evidence of their commitment to establish, implement, maintain and improve the Food Safety Management System.
FSM N 6.1	Management review	The standard shall require that the agent / broker's senior management review the verification of the Food Safety Management System at planned intervals, to ensure their continuing suitability, adequacy and effectiveness.
FSM N 6.2	Management review	The senior management shall ensure that Food Safety Management Systems are reviewed within a defined time frame in the event of any change affecting food safety. Such a review shall evaluate the need for changes in order to maintain the Food Safety Management System.

FSM N 7	Resource management	The standard shall require that the agent / broker's senior management determines and provides, in a timely manner, the qualified resources (including suitably qualified personnel) needed to implement, maintain, review and improve the Food Safety Management System.
FSM N 8.1	General documentation requirements	The standard shall require that documentation procedures are in place to demonstrate compliance with the standard.
FSM N 8.2	General documentation requirements	The standard shall require that documentation procedures are in place to ensure that all records required to demonstrate the effective operation and control of its processes and the management of food safety are securely stored.
FSM N 8.3	General documentation requirements	The standard shall require that the documentation procedures described under FSM N 8.1 and FSM N 8.2 are securely stored for the time period required to meet customer or legal requirements, effectively controlled and readily accessible when needed.
FSM N 9	Specified requirements	The standard shall require that the agent / broker ensures that for all traded products, documented specifications are in place and up-to-date.
FSM N 10	Procedures	The standard shall require that the agent / broker establishes, implements and maintains documented and detailed procedures and instructions for all processes and operations having an effect on food safety.
FSM N 11	Internal audit	The standard shall require that the agent / broker has an internal audit system in place to cover the scope of the Food Safety Management System
FSM N 12	Corrective action	The standard shall require that the agent / broker has procedures in place for the determination and implementation of corrective action in the event of any significant non-conformity relating to food safety.
FSM N 13	Control of nonconformity	The standard shall require that the agent / broker has effective and documented processes in place, to ensure that any traded products or services, which do not conform to food safety requirements are clearly identified and controlled to prevent unintended use or delivery.

FSM N 14	Product release	The standard shall require that the agent / broker prepares and implements appropriate product release procedures.
FSM N 15.1	Purchasing	The standard shall require that the agent / broker controls purchasing processes to ensure that all traded products and services which have an effect on food safety conform to food safety requirements.
FSM N 15.2	Purchasing	The standard shall require that the agent / broker has a risk assessment in place on all traded products and services which have an effect on food safety.
FSM N 15.3	Purchasing (non-approved supplier)	Use of non-approved suppliers shall be acceptable in an emergency situation provided the supplier's facility has been assessed and the product meets the specification.
FSM N 16	Supplier performance	The standard shall require that the agent / broker establishes, implements and maintains procedures for the evaluation, approval and continued monitoring of suppliers which have an effect on food safety. The results of evaluations, investigations and follow up actions shall be recorded.
FSM N 17	Complaint handling	The standard shall require that the agent / broker establishes, implements and maintains an effective system for the management of complaints and complaint data in order to control and correct shortcomings in food safety.
FSM N 18	Serious incident management	The standard shall require that the agent / broker establishes, implements and maintains an effective incident management procedure, which is regularly tested for all traded products it supplies and covers planning for product withdrawal and product recall as required.
FSM N 19.1	Food defence threat assessment	The standard shall require that the agent / broker ensures that their suppliers have a documented food defence threat assessment procedure in place to identify potential threats and prioritise food defence measures.
FSM N 19.2	Food defence plan	The standard shall require that the agent / broker ensures that their suppliers have a documented plan in place that specifies the measures they have implemented to mitigate the public health risks from any identified food defence threats.

FSM N 19.3	Food defence plan	The standard shall require that the agent / broker ensures that their suppliers' food defence plan is supported by the suppliers' Food Safety Management System.
FSM N 20	Food fraud vulnerability assessment	The standard shall require that the agent / broker has a documented food fraud vulnerability assessment procedure in place to identify potential vulnerability and prioritise food fraud mitigation measures.
FSM N 21.1	Food fraud mitigation plan	The standard shall require that the agent / broker has a documented plan in place that specifies the measures the agent / broker has implemented to mitigate the public health risks from the identified food fraud vulnerabilities.
FSM N 21.2	Food fraud mitigation plan	The standard shall require that the agent / broker's food fraud mitigation plan shall be supported by the agent / broker's Food Safety Management System.
FSM N 21.3	Food fraud mitigation plan	The standard shall require that the agent / broker ensures that their suppliers comply to clauses FSM N 20, 21.1 and 21.2
FSM N 22.1	Traceability	The standard shall require that the agent / broker is able to provide traceability of traded products back to the supplier in the supply chain where processing / primary production last occurred and one step forward, as a minimum.
FSM N 22.2	Traceability	The standard shall require that the traceability system shall be regularly tested.
FSM N 23	Product labelling	The standard shall require that the agent / broker ensures that all product bears appropriate information according to customer and legal requirements.
FSM N 24	Food safety legislation	The standard shall require that the agent / broker ensures that their suppliers' activity is compliant to food safety legislation in the country of operation and of known destination.