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SECTION 1: HACCP or Hazard Based Requirements

Clause Number	Clause Name	Certification Programme Application Requirement	Compliant?	Certification Programme Information - Narrative text	Supporting Documentation Reference	FOR GFSI only	FOR GFSI only
Table I: HACCP Requirements						Compliant	Feedback GFSI
HACCP D 1.1	Hazard Analysis and Critical Control Point (HACCP)	The standard shall require that the organisationhas a HACCP or HACCP based system in place including pre- requisite programmes.	Yes	Freshcare is a HACCP based program All the pre-requisite programs are prescribed within the Freshcare standard. All elements of the standard are mandatory for compliance.	Freshcare Master HACCP Plan Freshcare Food Safety & Quality Edition 4 (FSQ4.1), New Version 4.1 to be published 1/7/2019 pending GFSI final approval Freshcare is a HACCP based system. Therefore the requirement on participating businesses is that the Freshcare system has been fully implemented. The HACCP plan is not routinely provided to Freshcare participating businesses. Like most other prescriptive food safety programs, the outcomes of the hazard analysis are documented as prescriptive compliance criteria. Where there is potential for variation in risk between production situations, the critical control points are managed through a mandatory risk assessment process. The risk assessments are included as an appendix in FSQ4.1. Al pre-requisite programmes are covered within the prescriptive elements of FSQ4.1 e.g. micro / chem / physical contaminant control, cleaning. maintenance, suppliers, training, trace and recall 13/5/19 - This is now addressed in the introduction section to the standard (page 3) and includes reference to HACCP, Freshcare rules (Normative document) cross references the HACCP plan, also listed as an external resource to F1 element (Risk assessments) Codex Alimentarius Recommended International Codes of Practice – General Principles of Food Hygiene CAC / RCP 1-1969, Rev 4-2003	Yes	
HACCP D 1.2	Hazard Analysis and Critical Control Point (HACCP)	The standard shall require that the HACCP or HACCP based system shall prescribe the measures taken to apply those critical controls to assure, monitor and maintain food safety.	Yes	The four critical control points identified in the Freshcare master HACCP plan are addressed as mandatory risk assessments in the Freshcare Standard, Element F1 - Hazard Analysis. In addition, if any additional food safety risks are identified, a risk asessment is conducted and additional actions implemented if required by the hazard analysis (F1.5) Compliance is further prescribed through the individual prescriptive elements of the Freshcare standard.	Freshcare Food Safety & Quality Edition 4 (FSQ4.1) - F1 - Hazard Analysis (pages 12-13) and Appendix RA-F1.1 - RA-F1.4 FSQ4.1 Factsheet - F1 Hazard Analysis Form - F1 Risk assessment - persistent chemicals Form - F1 Risk assessment - heavy metals Form - F1 Risk assessment - fertilisers and soil additives Form - F1 Risk assessment - preharvest water Form - F1 Risk assessment - other practices	Yes	
HACCP D 1.3	Hazard Analysis and Critical Control Point (HACCP)	The standard shall require that the HACCP or HACCP- based system shall be prepared in accordance with Codex Alimentarius HACCP principles and the relevant law.	Yes	The Freshcare Master HACCP plan was developed in accordance with Codex HACCP.	Freshcare Master HACCP Plan - Purpose (page 2)	Yes	
HACCP D 1.4	Hazard Analysis and Critical Control Point (HACCP)	The standard shall require that the HACCP or HACCP- based system shall cover a product or a product grouping and its production.	Yes	Freshcare has been developed for the fresh produce industry. The scope of Freshcare FSQ4 is grower or grower/packer; and crops or crop groupings (where allowed) are in accordance with the Freshcare crop list. The operational scope of Freshcare is illustrated in the flow diagram contained within the Master HACCP	Freshcare Master HACCP Plan - Flow Diagram (page 4-7) Freshcare Crop List Ref1804	Yes	

HACCP D 1.5	Hazard Analysis and Critical Control Point (HACCP)	The standard shall require that the HACCP or HACCP based system shall include documented Standard Operating Practices (SOPs) and Work Instructions (WIs) as required and applicable to the organisation's scope of certification.	Yes	Freshcare requires that compliance with the standard is underpinned with appropriate documentation for all areas of the business that may impact food safety. This includes the need for training and communication of proceedures and work instructions through that training. The Freshcare standard has been developed to provide organisations with detailed instruction and guidance in all processes and operations that may impact food safety. This format of 'inclusive procedures / guidance' was developed to ensure food safety practices, procedures and instructions are followed for all key areas of food safety impact and can also be reviewed as part of the audit process. Thus ensuring validity of procedure / process. The records required for each area are documented within the standard. Written food safety instructions are provided to all workers and visitors and provide the basis for basic food safety compliance. Experience of the last 18 years has shown a formal SOP / WI manual to be ineffective in small / medium owner	Freshcare Food Safety & Quality Edition 4 (FSQ4.1) - M2 (page 8) FSQ4.1 Factsheet - M2 Documentation It is acknowledged that consistent and appropriate guidance in procedures and practices is very important; but it is also recognised that mandating SOPs / WIs in the wrong way will have limited effect and is contrary to the increasingly strong focus on food safety culture v documented compliance. 13/5/19 - The requirement that a business has procedure and work instruction is now included as element M2.1; factsheet to be updated to included examples of tasks that would be relevant - such as handwashing, spraying, management of wash baths, control of tools etc; Template (Form) to be provided for businesses to document these. Example FSQ4.1.1 Form - Work Instruction-Handwashing Ref1905 M2.1.1.1 Procedures and work instructions are documented and implemented for activities that impact food safety. M2.1.2.1 Procedures and work instructions are reviewed at least annually or when changes to processes occur.	Yes	

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SECTION 2: Food Safety Management Requirements

Clause Number	Clause Name	Certification Programme Application Requirement	Compliant?	Certification Programme Information - Narrative text	Supporting Documentation Reference	FOR GFSI only	FOR GFSI only
Table 1 Food Safety Management Requirements						**Compliant**	**Feedback GFSI**
FSM D 1	Food safety management general requirements	The standard shall require that the elements of the organisation's Food Safety Management System be documented, implemented, maintained and continually improved.	Yes	The business commitment to Freshcare is demonstated through element M1.4 - Document the business commitment to the Freshcare Code of Practice.	Freshcare Food Safety & Quality Edition 4 (FSQ4.1) - M1 Scope & Commitment - M1.4 (page 7) FSQ4.1 Factsheet - M1 Scope & Commitment	yes	
FSM D 2	Food safety policy	The standard shall require the organisation to have a clear, concise and documented food safety policy statement and measurable objectives specifying the extent of the organisation's commitment to meet the safety needs of its products.	Yes	The business commitment to Freshcare is demonstated through element M1.4 - Document the business commitment to the Freshcare Code of Practice.	Freshcare Food Safety & Quality Edition 4 (FSQ4.1) - M1 Scope & Commitment - M1.4 (page 7) FSQ4.1 Factsheet - M1 Scope & Commitment FSQ4.1 Form - M1 Commitment statement 13/5/19- FSQ Policy now worded instead of commitment. M1.4 (page 7) M1.4.1.A Food Safety and Quality Policy is documented and must include measurable objectives. M1.4.2.The owner or appropriate senior manager signs the Food Safety and Quality Policy committing to support and comply with the Freshcare Food Safety & Quality Standard, Freshcare Rules and all legislative requirements. M1.4.3.The Food Safety and Quality Policy is communicated to all workers. M1.4.4.The Food Safety and Quality Policy is reviewed at least annually, and when changes occur that may impact food safety or quality. A record is kept. - Form FSQ4.1.1 Form – M1 Food Safety and Quality Policy is included as an example Policy. Factsheet M1 to be amended to reflect changes and provide guidance on measurable objectives.	Yes	
FSM D 3	Management responsibility	The standard shall require that the organisation 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.	Yes	The organisation structure is documented, including those responsible for the management of food safety and quality and the associated reporting relationships.	Freshcare Food Safety & Quality Edition 4 (FSQ4.1) - M4 Internal audit and corrective action - M1.3 (page 6) FSQ4.1 Factsheet - M1 Scope & Commitment 13/5/19- M1.3 addresses (page 6/7). Organisational chart and Position descriptions included as documents that need to be completed. Specifically M1.3.1.The owner and/or appropriate senior manager provides suitably qualified workers to implement, maintain, review and improve the food safety program of the business. M1.3.2.The organisational structure of the business is documented and must include: • workers responsible for the management of food safety and quality • reporting relationships of all workers whose roles may affect food safety and quality. M1.3.3.Position descriptions are documented for workers responsible for the management of food safety and quality. M1.3.4.The organisational structure, roles and responsibilities are reviewed at least annually or when changes occur. A record is kept. M1.3.5.The organisational structure, roles and responsibilities are communicated to all workers.	yes	
FSM D 4	Management commitment	The standard shall require that the organisation's senior management provides evidence of their commitment to establish, implement, maintain and improve the Food Safety System.	Yes	As per FSM D2 above		yes	
FSM D 5.1	Management review	The standard shall require that the organisation's senior management review the verification of the Food Safety System, HACCP plan or HACCP based plans, at planned intervals, to ensure their continuing suitability, adequacy and effectiveness.	Yes	All risk assessments are reviewed at least annually or when changes occur that may impact the significance of the hazards. In addition, at a minimum all aspects of the Freshcare system are reviewed at least annually, through the internal audit process.	Freshcare Food Safety & Quality Edition 4 (FSQ4.1) - F1 Hazard Analysis - F1.7 (page13) and M4 Internal audit and corrective action - M4.1 (page 10) FSQ4.1 Factsheet - F1 Hazard Analysis FSQ4.1 Factsheet - M4 Internal Audit & Corrective Action	yes	
FSM D 5.2	Management review	The standard shall require that the HACCP plan and food safety programmes (or prerequisite programmes) shall also be reviewed in the event of any change that impacts food safety. Such a review shall evaluate the need for changes to the Food Safety System, including the food safety policy and food safety objectives.	Yes	Freshcare requires that all risk assessments are reviewed at least annually, or when changes occur that may impact the significance of the hazards. All aspects of the Freshcare system are reviewed at least annually, through the internal audit process, to verify ongoing compliance with the Code of Practice.	Freshcare Food Safety & Quality Edition 4 (FSQ4.1) - F1 Hazard Analysis - F1.7 (page 13) and M4 Internal Audit & Corrective Action - M4.1 (page 10) FSQ4.1 Factsheet - M4 Internal Audit & Corrective Action FSQ4.1 Factsheet - F1 Hazard Analysis 13/5/19 - M4.3 now addresses this (page 10), Factsheet to be updated to provide further guidance. M 4.3.1 A management review of compliance is conducted at least annually. A record of the review is kept and must include: • Internal and external audits • Corrective actions • Customer feedback • Complaints • Training • Food safety and quality policy and measurable objectives.	yes	

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FSM D 6	Resource management	The standard shall require that the organisation'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 System.	Yes	Freshcare requires that the business organisational structure is defined with clear allocation of responsibilities for the management of food safety and quality (M1.3). This is further supported by the management commitment to comply with Freshcare requirements (M1.4) and the stated requiremenst for training for both a management representative and for all those who complete tasks relevant to the Code of Practice (M3)	Freshcare Food Safety & Quality Edition 4 (FSQ4.1) - M1 Scope & Commitment - M1.3 (page 6) and M1.4 (page 7) and M3 Training (page 9) FSQ4.1 Factsheet - M1 Scope & Commitment FSQ4.1 Factsheet - M3 Training The Freshcare standard is designed to ensure ownership and understanding of requirements by the participating business. Participation in Freshcare training is mandatory and provides that food safety knowledge to the nominated person within each business (FSQ4.1 - M3.1). The competency is monitored through the audit process and outcomes. 13/5/19 - (page 6) M1.3 now addresses this M1.3.1 The owner and/or appropriate senior manager provides suitably qualified workers to implement, maintain, review and improve the food safety program of the business.	yes	
FSM D 7.1	General documentation requirements	The standard shall require that documentation procedures are in place to demonstrate compliance with the standard.	Yes	Freshcare requires all businesses are able to demonstrate compliance through relevant documents and records, as detailed in element M2. In addition, the record keeping requirements of each Freshcare element are clearly stated and referenced throughout the Freshcare standard.	Freshcare Food Safety & Quality Edition 4 (FSQ4.1) - M2 Documentation (page 8) FSQ4.1 Factsheet - M3 Training	yes	
FSM D 7.2	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.	Yes	Freshcare requires that records are held for a mimimum of 2 years and longer if required by legislation or customers.	Freshcare Food Safety & Quality Edition 4 (FSQ4.1) - M2 Documentation - M2.1.4 (page 8) FSQ4.1 Factsheet - M2 Documentation . 13/5/19 - M2.2 now addresses this (page 8) M2.2.4. All records are securely stored and kept for a minimum of two years (or longer if required by legislation or customers).	yes	
FSM D 7.3	General documentation requirements	The standard shall require that the documentation procedures described under FSM D 7.1 and FSM D 7.2 are securely stored for the time period required to meet customer or legal requirements, effectively controlled and are readily accessible when needed.	Yes	Freshcare requires that records are held for a mimimum of 2 years and longer if required by legislation or customers.	Freshcare Food Safety & Quality Edition 4 (FSQ4.1) - M2 Documentation - M2.1.4 (page 8) FSQ4.1 Factsheet - M2 Documentation	yes	
FSM D 8.1	Specified requirements	The standard shall require that the organisation ensures that documented specifications or requirements are prepared, maintained, securely stored and readily accessible when needed for all inputs to the process, items and services (including utilities, transport and maintenance) that are purchased or provided and have an effect on product safety.	Yes	Freshcare requires that all materials and services that may introduce a food safety risk are identified and managed. Suppliers of all materials and services that may impact food safety are required to comply with all the applicable requirements of FSQ4 e.g. chemical suppliers must comply in full with the requirements of F4.1 - Obtain properly labelled chemicals from approved suppliers and ensure labels remain legible. Purchase records and evidence of compliance with stated requirements are kept. Guidance on the expectation from suppliers is provided in the F11 Supplier Factsheeet - Supplier Requirements Table.	Freshcare Food Safety & Quality Edition 4 (FSQ4.1) - F11 Suppliers - (page 31) FSQ4.1 Factsheet - F11 Suppliers	yes	
FSM D 8.2	Specified requirements	The standard shall require that a specification review process is in place.	Yes	Freshcare requires that approved supplier records are reviewed annually.	Freshcare Food Safety & Quality Edition 4 (FSQ4.1) - F11 Suppliers - F11.1 (page 31) FSQ4.1 Factsheet - F11 Suppliers	yes	
FSM D 9	Procedures	The standard shall require that the organisation establishes, implements and maintains documented and detailed procedures and instructions for all processes and operations having an effect on food safety.	Yes	The Freshcare standard has been developed to provide organisations with detailed instruction and guidance in all processes and operations that may impact food safety. This format of 'inclusive procedures / guidance' was developed to ensure food safety practices, procedures and instructions are followed for all key areas of food safety impact and can also be reviewed as part of the audit process. Thus ensuring validity of procedure / process. The records required for each area are documented within the standard. Written food safety instructions are provided to all workers and visitors and provide the basis for basic food safety compliance. It is recognised that in addition to the procedural guideance within the Freshcare standard, additional 'best practice guidance /standard procedures' in key area operational areas is required. An example of this is the collaborative project to deliver operational guidelines for safe compost production. This area is under review in colaboration with key stakeholder groups including trainers, certification bodies and major retail customers to identify other areas requiring best practice guidelines / instructions, a water treatment guidance document is currently being developed.	Freshcare Food Safety & Quality Edition 4 (FSQ4.1) - all elements Compost Factsheet - Growers 13/5/19 -addressed in M2.1 (page 8) M2 Factsheet to be updated to include reference to food safety critical procedures (handwashing, spraying, management of wash baths, control of tools, product release etc) that would be expected to be documented by a business. Template (Form M2) to be provided for businesses to document these. M2.1.1.2 Procedures and work instructions are documented and implemented for activities that impact food safety. M2.1.2.2 Procedures and work instructions are reviewed at least annually or when changes to processes occur. Example FSQ4.1.1 Form - Work Instruction- Handwashing Ref1905	yes	
FSM D 10	Internal audit	The standard shall require that the organisation has an internal audit system in place to cover the scope of the Food Safety Management System.	Yes	Freshcare considers the internal audit and corrective action element fundamental to effective program implementation and management. An internal audit of all activities and records is conducted at least annually and a record is kept.	Freshcare Food Safety & Quality Edition 4 (FSQ4.1) - M4 Internal Audit & Corrective Action - M4.1 (page 10) FSQ4.1 Factsheet - M4 Internal Audit & Corrective Action	yes	

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FSM D 11	Corrective action	The standard shall require that the organisation has procedures in place for the determination and implementation of corrective action in the event of any significant non-conformity relating to food safety.	Yes	Freshcare requires corrective actions are identified and effectively managed for any areas of non-compliance identified in routine activities, internal and external audit or through complaints received. The procedure and reporting requirements are detailed in element M4.	Freshcare Food Safety & Quality Edition 4 (FSQ4.1) - M4 Internal Audit & Corrective Action - M4.2 (page 10) FSQ4.1 Factsheet - M4 Internal Audit & Corrective Action Significant non conformities related to food safety are definitely covered under the CAR management process. Any non compliance against the Freshcare standard: 1. A Corrective Action Record (CAR) must be completed when the requirements of the Freshcare Code of Practice Food Safety & Quality, Freshcare Rules or legislation are not being met, as identified by: • routine activities • annual internal audits • annual external audits • a valid complaint received from a neighbour, customer or regulatory authority • produce identified as being contaminated, or potentially contaminated.	Yes	
FSM D 12	Control of non conformity	The standard shall require that the organisation has effective and documented processes in place to ensure that any product which does not conform to food safety requirements is clearly identified and controlled to prevent unintended use or delivery.	Yes	Freshcare requires that all product is clearly identified and traceable from production to final destination. The system enables trace and isolation of product should a food safety iussue be identified. By the very nature of fresh produce and the fresh produce supply chain, as generally a short shelf life product, product has often been released into the supply chain before a food safety issue is identified (issues most commonly identified through chemical and microbial testing), thus full traceability is critical to effectively manage the process. Element M5 further enforces compliance with food safety specifications, any non compliance identified prior or post dispatch is notified to a customer and course of action agreed.	Freshcare Food Safety & Quality Edition 4 (FSQ4.1) - M5 Comply with Customer Specification (page 11) and F13 Product Identification & Traceability (page 33) FSQ4.1 Factsheet - M5 Customer Requirements FSQ4.1 Factsheet - F13 Product Identification & Traceability 13/5/19 - F13.2 now addresses this (page 34) and is also relevant to M2.1 (page 8) as a procedure that would be critical to food safety. M13 factsheet to be updated to include example. F13.2 Maintain product release procedures to enable produce that does not meet food safety requirements to be clearly identified and controlled to prevent unintended use or delivery. M13.2.1 Documented release procedures are maintained and implemented. M13.2.2 The product release procedures are reviewed at least annually. A record is kept.	yes	
FSM D 13	Product release	The standard shall require that the organisation prepares and implements appropriate product release procedures.	Yes	Not explicitly stated in FSQ4, although evidence of effective management of product following a food safety incoident would be expected at audit in compliance with elements M5 and F13. Requirements to be considered for inclusion in FSQ5.	13/5/19 - F13.2 now addresses this. (Page 34) Further supported by M13.1 (Corrective Action) and M2.2 (Procedures) F13.2 Maintain product release procedures to enable produce that does not meet food safety requirements to be clearly identified and controlled to prevent unintended use or delivery. M13.2.1 Documented release procedures are maintained and implemented. M13.2.2 The product release procedures are reviewed at least annually. A record is kept.	yes	
FSM D 14.1	Purchasing	The standard shall require that the organisation controls purchasing processes to ensure that all externally sourced materials and outsourced services which have an effect on food safety, conform to food safety requirements.	Yes		Freshcare Food Safety & Quality Edition 4 (FSQ4.1) - F11 Suppliers - (page 31) FSQ4.1 Factsheet - F11 Suppliers Form - F11 Supplier table For products and services potentially impacting food safety, this is effectively managed through F11 Suppliers. Purchase records are kept and audited against the Supplier listing. 13/5/19 - this is covered under F11 Factsheet and specifically: F11.1.3 Evidence of compliance for suppliers of materials and services is kept and must include: • Independent evidence of compliance, or • a written declaration to comply with requirements, or • a record of inspection/assessment against requirements. so each supplier regardless of whether pre-approved or emergency or outsourced are required to meet the same criteria, or are checked for compliance prior to the goods/ services being accepted by the site (and recorded as such). Outsourcing provided as guidance in the factsheet Input materials and services (including outsourced services) can introduce food safety hazards into the business. This includes raw materials, such as produce, packaging, fertilisers and agricultural chemicals as well as services such as transport, crop spraying, co-packers or advice such as pest management or nutritional advice.	Yes	

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FSM D 14.2	Purchasing	The standard shall require that control of outsourced processes that may have an effect on food safety shall be identified and documented in the Food Safety System.	Yes	Freshcare requires that all materials and services that may introduce a food safety risk are identified and managed. A record is kept and reviewed annually.	Freshcare Food Safety & Quality Edition 4 (FSQ4.1) - F11 Suppliers - F11.1 (page 31) FSQ4.1 Factsheet - F11 Suppliers Form - F11 Supplier table For services potentially impacting food safety, this is effectively managed through F11 Suppliers. F11.1.2. Suppliers of materials and services identified in F11.1.1 must comply with the applicable requirements of the Freshcare Code of Practice Food Safety & Quality. i.e. they must meet the same requirements as it the process was managed by the business itself and evidence of that compliance must be kept. 13/5/19 - this is covered under F11 Factsheet and specifically: F11.1.3 Evidence of compliance for suppliers of materials and services is kept and must include: •Independent evidence of compliance, or •A written declaration to comply with requirements, or •A record of inspection/assessment against requirements. so each supplier regardless of whether pre-approved or emergency or outsourced are required to meet the same criteria, or are checked for compliance prior to the goods/ services being accepted by the site (and recorded as such). Outsourcing provided as guidance in the factsheet Input materials and services (including outsourced services) can introduce food safety hazards into the business. This includes raw materials, such as produce, packaging, fertilisers and agricultural chemicals as well as services such as transport, crop spraying, co-packers or advice such as pest management or nutritional advice.	Yes	services are classed as an outsourced
FSM D 14.3	Purchasing (non-approved supplier)	Use of non-approved suppliers shall be acceptable in an emergency situation provided the facility has been assessed and the product meets the specification.	Yes	In this instance, a supplier is approved through inspection / assessment against requirements. Freshcare still requires the supplier be added to the approved supplier list, but with inspection / assessment as evidence of compliance.	Freshcare Food Safety & Quality Edition 4 (FSQ4.1) - F11 Suppliers - F11.1.3 (page 31) FSQ4.1 Factsheet - F11 Suppliers Form - F11 Supplier table F11.1.3.4 - In an emergency situation, a product or service is inspected at point of receipt for compliance and a record kept. 13/5/19 - this is covered under F11 Factsheet and specifically: F11.1.3 Evidence of compliance for suppliers of materials and services is kept and must include: •Independent evidence of compliance, or •A written declaration to comply with requirements, or •A record of inspection/assessment against requirements. so each supplier regardless of whether pre-approved or emergency or outsourced are required to meet the same criteria, or are checked for compliance prior to the goods/ services being accepted by the site (and recorded as such). Outsourcing provided as guidance in the factsheet Input materials and services (including outsourced services) can introduce food safety hazards into the business. This includes raw materials, such as produce, packaging, fertilisers and agricultural chemicals as well as services such as transport, crop spraying, co-packers or advice such as pest management or nutritional advice.	Yes	
FSM D 15	Supplier Performance	The standard shall require that the organisation 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.	Yes	Freshcare requires for the approved supplier list to be reviewed annually. If an investigation is required, an internal CAR is raised and process documented.	Freshcare Food Safety & Quality Edition 4 (FSQ4.1) - F11 Suppliers - F11.1.3 (page 31), M4 Internal audit and corrective action FSQ4.1 Factsheet - F11 Suppliers FSQ4.1 Form - F11 Supplier table FSQ4.1 Form - M4 Corrective action record (CAR) FSQ4.1 Factsheet - M4 Internal audit and corrective action	yes	
FSM D 16	Complaint handling	The standard shall require that the organisation 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.	Yes	Within the Freshcare system complaints are logged and managed through the corrective action process.	Freshcare Food Safety & Quality Edition 4 (FSQ4.1) - M4 Internal Audit & Corrective Action - M4.2 (page 10) FSQ4.1 Factsheet - M4 Internal Audit & Corrective Action 13/5/19 - left complaint as generic term; refer M4.2.1 (page 10)	yes	

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FSM D 17	Serious incident management	The standard shall require that the organisation establishes, implements and maintains an effective incident management procedure, which is regularly tested for all products it supplies and covers planning for product withdrawal and product recall as required.	Partly	Freshcare requires incidents are routinely managed through the internal audit and corrective action process. Freshcare requires a product recall system is implemented and maintained to enable unsafe produce to be effectively recalled. A mock recall is completed at least annually and a record kept. The system is also utilised for withdrawal (product quality).	Freshcare Food Safety & Quality Edition 4 (FSQ4.1) - M4 Internal Audit & Corrective Action - M4.2 (page 10) and F14 Recall - F14.1 (page 34) FSQ4.1 Factsheet - M4 Internal Audit & Corrective Action FSQ4.1 Factsheet - F14 Recall 13/5/19 - addressed as element F14.1. Also referenced in M4.2 (Corrective action record) F14.1.1. An incident management procedure must include the requirements for: • Incident reporting • Product hold and release • Product withdrawal and product recall F14.1.2. The incident management procedure is documented and must include: • Workers responsible for incident management • Name of person documenting the plan • Date plan is developed. F14.1.3. A test of the incident management procedure is conducted at least annually. A record is kept. F14.1.4. The incident management procedure is reviewed at least annually, and following any event requiring the incident management procedure to be actioned. A record is kept.	yes	
FSM D 18.1	Control of measuring and monitoring devices	The standard shall require that the organisation identifies the equipment used to measure parameters critical to ensure food safety.	Yes	Freshcare requires that monitoring and measuring equipment is identified and a register of equipment maintained. At an operational level most equipment found on farm / in packing operations is designed to measure quality parameters, rather than food safety. The list would typically include refractometers, temperature probes etc. Equipment integral to food safety management would include chlorine dosing and ozone treeatment units for water quality.	Freshcare Food Safety & Quality Edition 4 (FSQ4.1) - F8 Premises, facilities, tools, packaging and vehicles - F8.6 (page 27) Form F8 - Measuring and monitoring equipment register FSQ4.1 Factsheet - F8 Premises, facilities, tools, packaging and vehicles	Yes	F8.6
FSM D 18.2	Control of measuring and monitoring devices	The standard shall require that the organisation identifies the required monitoring of measuring devices critical to ensure food safety.	Yes	Freshcare requires that monitoring and measuring equipment is identified and a register of equipment maintained. At an operational level most equipment found on farm / in packing operations is designed to measure quality parameters, rather than food safety. The list would typically include refractometers, temperature probes etc. Equipment integral to food safety management would include chlorine dosing and ozone treeatment units for water quality.	Freshcare Food Safety & Quality Edition 4 (FSQ4.1) - F8 Premises, facilities, tools, packaging and vehicles - F8.6 (page 27) Form F8 - Measuring and monitoring equipment register FSQ4.1 Factsheet - F8 Premises, facilities, tools, packaging and vehicles	yes	
FSM D 18.3	Control of measuring and monitoring devices	The standard shall require that the organisation identifies methods to assure that the calibration of these measuring and monitoring devices is traceable to a recognised standard or method.	Yes	Element F8.6 requires calibration to be undertaken using a recognised method, at a predetermined frequency and with a record kept.	Freshcare Food Safety & Quality Edition 4 (FSQ4.1) - F8 Premises, facilities, tools, packaging and vehicles - F8.6 (page 27) Form F8 - Calibration record Guidelines for Fresh Produce Food Safety (2015) Chapter 10 - Managing equipment and tools - page 61 The Guidelines provide the source reference material for the Freshcare Standard. But are not a mandatory calibration guide. Depending on the equipment in question, the guidance is most likely to come from the manufacturer. The certified business needs to identify the 'recognised calibration method' and demonstrate compliance and outcomes. 13/5/19 - assessed as meeting requirements	Yes	
FSM D 19.1	Food defence threat assessment	The standard shall require that the organisation have a documented food defence threat assessment procedure in place to identify potential threats and prioritise food defence measures.	Yes	Freshcare requires that a food defence vulnerability assessment is completed to assess the risk of contamination of both raw materials and end product. If a threat is identified, a control plan is documented.	Freshcare Food Safety & Quality Edition 4 (FSQ4.1) - F12 - Food Defence & Food Fraud (page 32) FSQ4.1 Factsheet - Food Defence & Food Fraud Form - F12 - Food defence vulnerability assessment and control plan	yes	
FSM D 19.2	Food defence plan	The standard shall require that the organisation has a documented plan in place that specifies the measures the organisation has implemented to mitigate the public health risks from any identified food defence threats.	Yes	Freshcare requires that a food defence vulnerability assessment is completed to assess the risk of contamination of both raw materials and end product. If a threat is identified, a control plan is documented.	Freshcare Food Safety & Quality Edition 4 (FSQ4.1) - F12 - Food Defence & Food Fraud (page 32) FSQ4.1 Factsheet - Food Defence & Food Fraud Form - F12 - Food defence vulnerability assessment and control plan 13/5/19 - this has been addressed with re-wording (and addresses GFSI sub clauses). Refer F12.1 F12.1.1. A food defence vulnerability assessment is completed to assess the risk of intentional contamination of: • Raw materials (business inputs or produce) • End product. F12.1.2. Where a food defence threat is identified, a control plan is documented and must include mechanisms for control to mitigate risk to public health. F12.1.3. The food defence vulnerability assessment and control plan is reviewed at least annually and updated when changes occur.	Yes	

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FSM D 19.3	Food defence plan	The standard shall require that the organization's Food defence plan shall be supported by the organisation's Food Safety Management System.	Yes	As with all elements of the Freshcare standard, element F12 is a mandatory element and as such supported through the management commitment documented in M1.4.	Freshcare Food Safety & Quality Edition 4 (FSQ4.1) - M1 - Scope and commitment - M1.4 (page 7) also refer above	Yes	
FSM D 20	Food fraud vulnerability assessment	The standard shall require that the organisation has a documented food fraud vulnerability assessment procedure in place to identify potential vulnerability and prioritise food fraud mitigation measures.	Yes	Freshcare requires that a food fraud vulnerability assessment is completed to assess the potential risk of intentional adulteration, substitution or misrepresentation of both raw materials and end product. If a food fraud vulnerability is identified, a control plan is documented.	Freshcare Food Safety & Quality Edition 4 (FSQ4.1) - F12 - Food Defence & Food Fraud (page 32) FSQ4.1 Factsheet - Food Defence & Food Fraud Form - F12 - Food fraud vulnerability assessment and control plan 13/5/19 - this has been addressed with re-wording (and addresses GFSI sub clauses). Refer F12.2 F12.2.1.A food fraud vulnerability assessment is completed to assess the risk of intentional contamination of: • Raw materials (business inputs or produce) • End product. F12.2.2.Where a food fruad threat is identified, a control plan is documented and must include mechanisms for control to mitigate risk to public health. F12.2.3.The food fraud vulnerability assessment and control plan is reviewed at least annually and updated when changes occur.	Yes	
FSM D 21.1	Food fraud mitigation plan	The standard shall require that the organisation has a documented plan in place that specifies the measures the organisation has implemented to mitigate the public health risks from the identified food fraud vulnerabilities.	Yes	Freshcare requires that a food fraud vulnerability assessment is completed to assess the potential risk of intentional adulteration, substitution or misrepresentation of both raw materials and end product. If a food fraud vulnerability is identified, a control plan is documented.	Freshcare Food Safety & Quality Edition 4 (FSQ4.1) - F12 - Food Defence & Food Fraud (page 32) FSQ4.1 Factsheet - Food Defence & Food Fraud Form - F12 - Food fraud vulnerability assessment and control plan refer above	Yes	
FSM D 21.2	Food fraud mitigation plan	The standard shall require that the organisation's food fraud mitigation plan shall be supported by the organisation's Food Safety Management System.	Yes	As with all elements of the Freshcare standard, element F12 is a mandatory element and as such supported through the management commitment documented in M1.4.	Freshcare Food Safety & Quality Edition 4 (FSQ4.1) - M1 - Scope and commitment - M1.4 (page 7) refer above	Yes	
FSM D 22.1	Traceability	The standard shall require that the organisation establishes, implements and maintains appropriate procedures and systems to ensure an identification of any outsourced production, inputs or services related to food safety.	Yes	Freshcare requires that all outsourced production, inputs and services are identified and managed in accordance with the stated requirements of the Freshcare standard. Element F11 describes the requirements for all materials and services that may impoact food safety (F11.1) and all produce that is to be represented for sale as Freshcare certified (F11.2)	Freshcare Food Safety & Quality Edition 4 (FSQ4.1) - F11 Suppliers - (page 31) FSQ4.1 Factsheet - F11 Suppliers Form - F11 Supplier table The outsourced services are required to comply with the applicable requirements of the Freshcare standard (F11 Suppliers - F11.1.2). This compliance is demonstrated through independent evidence of compliance (F11.1.3.2) and evidence kept e.g. Certification of packing shed, chemical training / licence for spray operators. Similarly for products compliance with stated requirements through independent evidence or inspection. Fresh produced sourced from outside the business must comply with F11.2.1.1. i.e. grown under a Freshcare or Freshcare recognised (GFSI) system. Product must be managed within a business in accordance with F13 Product ID & Traceability. F13.1.3 covers records required. Both products and services would be traced through the normal commercial inwards goods / finished product management and dispatch system. 13/5/19 - this is covered under F11 Factsheet and also M2.2 (Procedures) and F13 (Product ID and Traceability) and specifically: F11.1.3 Evidence of compliance for suppliers of materials and services is kept and must include: • Independent evidence of compliance, or • A written declaration to comply with requirements, or • A record of inspection/assessment against requirements. so each supplier regardless of whether pre-approved or emergency or outsourced are required to meet the same criteria, or are checked for compliance prior to the goods/ services being accepted by the site (and recorded as such). Outsourcing provided as guidance in the factsheet Input materials and services (including outsourced services) can introduce food safety hazards into the business. This includes raw materials, such as produce, packaging, fertilisers and agricultural chemicals as well as services such as transport, crop spraying, co-packers or advice such as pest management or nutritional advice.	yes	

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FSM D 22.2	Traceability	The standard shall require that the organisation establishes, implements and maintains appropriate procedures and systems to ensure that the product identification enables traceability to the producer.	Yes	Freshcare requires organisations maintain a product identification and traceability system to enable product to be traced back to supplier. As stated previously, all produce that is to be represented for sale as Freshcare certified (F11.2) must be grown by a business certified to Freshcare or a food safety program recognised by Freshcare and/or packed by a business certified to Freshcare or a food safety program recognised by Freshcare.	Freshcare Food Safety & Quality Edition 4 (FSQ4.1) - F13 Product Identification & Traceability - (page 33) FSQ4.1 Factsheet - F13 Product Identification & Traceability Form - F13 Harvest and packing records Form - F13 Supplier traceability The Freshcare system requires trace back to field and forward to customer. Supported by appropriate records and labelling as outlined in F13.1, which requires a business to 'Maintain a product identification and traceability system to enable produce to be traced from production to its destination' Both products and services would also be traced through the normal commercial inwards goods / finished product management and dispatch system. 13/5/19 - we believe this is adequately addressed	Yes	
FSM D 22.3	Traceability	The standard shall require that the organisation establishes, implements and maintains appropriate procedures and systems to ensure a record of purchaser and delivery destination for all products supplied. This refers to one step forward and one step backward as a minimum.	Yes	Freshcare requires organisations maintain a product identification and traceability system to enable product to be traced forward to customer.	Freshcare Food Safety & Quality Edition 4 (FSQ4.1) - F13 Product Identification & Traceability - (page 33) FSQ4.1 Factsheet - F13 Product Identification & Traceability Form - F13 Harvest and packing records Form - F13 Supplier traceability	yes	
FSM D 23	Analysis of Inputs (e.g. water, ice)	The standard shall require that analysis be performed by a competent laboratory when it is critical to the verification of food safety is undertaken.	Yes	Where Freshcare requires verification testing (chemical) for compliance, that testing is undertaken by a laboratory with NATA accreditation to ISO/IEC 17025 for the analysis of chemical residues. The criteria for labs undertaking micro testing of water and fresh produce is not stated; for product micro testing NATA accreditation could be referenced, but wrt water testing, most is undertaken in regional (water authority) labs who may not be accredited.	Freshcare Food Safety & Quality Edition 4 (FSQ4.1) - F4 Chemicals - F4.9.2 (page 19) 13/5/19 - "competent laboratory" defined and added as wording to standard F11.1.5.1 Competent laboratories are used when testing to verify compliance with requirements of the Freshcare Food Safety & Quality Standard. and definition in glossary (page 42). A laboratory with NATA accreditation, or accredited to ISO/IEC 17025, for the required scope of testing. Or a laboratory run by a local, state or federal government authority or university, that follows Australian Standard methods for the required scope of testing. Additionally factsheet F11 - suppliers that includes reference to laboratory will include "competent".	Yes	In supplier requirements factsheet
FSM D 24	Product Labelling	The standard shall ensure that finished product is labelled according to the applicable food regulations in the country of intended sale.	Yes	Freshcare requires all packed produce is marked with business name and physical addresss, packing date and/or batch identificaiton code and any other trade descriptions required by customer or legislation.	Freshcare Food Safety & Quality Edition 4 (FSQ4.1) - F13 Product Identification & Traceability - (page 33) FSQ4.1 Factsheet - F13 Product Identification & Traceability	Yes	
FSM D 25	Allergen Management	The standard shall require that an allergen management plan is in place in all food manufacturing facilities. This shall include a risk assessment of allergen cross contact and implemented controls to reduce or eliminate the risk of cross contact.	Yes	Freshcare requires for potential sources of allergens to be identified and managed. This is documented in an allergen management plan.	Freshcare Food Safety & Quality Edition 4 (FSQ4.1) - F7 Allergens (page 24) FSQ4.1 Factsheet - F7 Allergens FSQ4.1 Form - F7 Allergen management plan	yes	
FSM D 26	Allergen Labelling	The standard shall require that all finished products intentionally or potentially containing allergenic materials are labelled according to the allergen labelling regulations in the country of manufacture and the country of destination.	Yes	Freshcare requires for packed product to be marked with trade descriptions required by customer or legislation. Though not explicitly stated, this includes any allergen labelling requirements. This area will be addressed in FSQ5.	Freshcare Food Safety & Quality Edition 4 (FSQ4.1) - F13 Product Identification & Traceability - (page 33) FSQ4.1 Factsheet - F13 Product Identification & Traceability Freshcare works closely with the allergen bureau re. allergen labelling / notification requirements. 13/5/19 - now addressed via inclusion into F7.2 specifically F7.2.1.1 Labelling of packed product that contains, or may contain, allergens is compliant with allergen labelling regulations in the country of production and/or the country of destination.	yes	
FSM D 27	Environmental monitoring	The standard shall require that a risk-based environmental monitoring programme be in place.	Yes	Please provide clarification regarding expectations in compliance with this clause. The Freshcare Food Safety & Quality Standard does not contain compliance criteria related to environmental assurance. Freshcare has an Environmental Standard to which businesses may be certified to.	13/5/19 - this is now addressed under F8.10; specifically F8.10 5. Monitoring activities are undertaken to ensure cleaning is effective. Factsheet F8 will be updated to specifically reference section 10.2 of the Fresh Produce safety Centre guidelines (page 63/64) which includes guidance on how to assess the effectiveness= of cleaning.	yes	
FSM D 28	Food Safety Legislation	The standard shall require that the organisation establishes, implements and maintains detailed procedures and instructions for all processes and operations having an effect on food safety to be compliant in the country of manufacturing as well as the country of known destination.	Yes	Freshcare requires that the business owner or appropriate senior manager commits to support and comply will all legislative requirements. For most Freshcare members the focus is on domestic market compliance, where general legislation and, chemical and microbial limits are set by FSANZ. Where product is destined for overseas markets the business is required to ensure residues do not exceed MRLs as specified by the customer and/or the importing country.	Freshcare Food Safety & Quality Edition 4 (FSQ4.1) - F4 Chemicals - F4.9. 3 (page 19)	Yes	

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SECTION 3: GOOD INDUSTRY SECTOR PRACTICE REQUIREMENTS

Clause Number	Clause Name	Certification Programme Application Requirement	Compliant?	Certification Programme Information - Narrative text	Supporting Documentation Reference	FOR GFSI only	FOR GFSI only
Table I: Good Manufacturing Practice Requirements						**Compliant**	**Feedback GFSI**
GMP D 1	Facility environment	The standard shall require that the site or facility is located and maintained so as to prevent contamination and in order to enable the production of safe products.	Yes	Freshcare requires that all property areas, infrastructure and local activities are identified on a property map, this requirement ensures that all potential food safety risk factors are identified and appropriate management strategies developed and implemented for the site. Element F2 focuses on the growing site, ensuring the site is managed to minimise the risk of contaminating produce. Element F8 focuses on premises and facilities, ensuring they are constructed and maintained to minimise the risk of contaminating produce.	Freshcare Food Safety & Quality Edition 4 (FSQ4.1) - M1 Scope and commitment - M1.2 (page 6) and F2 Growing site (page 14) and F8 Premises, facilities, equipment, tools, packaging and vehicles - F8.1 (page 25) FSQ4.1 Factsheet - M1 Scope and commitment FSQ4.1 Factsheet - F2 Growing site FSQ4.1 Factsheet - F8 Premises, facilities, equipment, tools, packaging and vehicles	yes	
GMP D 2	Local environment	The standard shall require that all grounds within the site or facility are maintained so as to prevent contamination and enable the production of safe products.	Yes	Freshcare requires that all property areas, infrastructure and local activities are identified on a property map, this requirement ensures that all potential food safety risk factors are identified and appropriate management strategies developed and implemented for the site. Element F2 focuses on the growing site, ensuring the site is managed to minimise the risk of contaminating produce. Element F8 focuses on premises and facilities, ensuring they are designed, constructed and maintained to minimise the risk of contaminating produce.	Freshcare Food Safety & Quality Edition 4 (FSQ4.1) - M1 Scope and commitment - M1.2 (page 6) and F2 Growing site (page 14) and F8 Premises, facilities, equipment, tools, packaging and vehicles - F8.1 (page 25) FSQ4.1 Factsheet - M1 Scope and commitment FSQ4.1 Factsheet - F2 Growing site FSQ4.1 Factsheet - F8 Premises, facilities, equipment, tools, packaging and vehicles 13/5/19, addressed under F8.1 by including :handling packing and storage areas specifically F8.1.2 Construct and maintain growing, handling, packing and storage facilities to ensure they are	Yes	Sites from M1 and F2.1
GMP D 3	Facility design, construction, layout and product flow	The standard shall require that premises, site and / or plant shall be designed, constructed and maintained, both the exterior and the interior, to control the risk of product contamination.	Yes	Element F8 focuses on premises and facilities, ensuring they are designed, constructed and maintained to minimise the risk of contaminating produce. Thius element covers all aspects from overall facility design, including additional requierements for product packed for retail sale, to the construct of septic and waste systems and associated infrastructure.	Freshcare Food Safety & Quality Edition 4 (FSQ4.1) - M1 Scope and commitment - M1.2 (page 6) and F8 Premises, facilities, equipment, tools, packaging and vehicles - F8.1 (page 25) FSQ4.1 Factsheet - M1 Scope and commitment FSQ4.1 Factsheet - F8 Premises, facilities, equipment, tools, packaging and vehicles 13/5/19, addressed under F8.1 by including :interior and exterior F8.1.1 Produce growing, handling, packing (including in-field packing) and storage facilities are located, designed, constructed and maintained (interior and exterior) to minimise the risk of contaminating produce.	yes	
GMP D 4	Fabrication (input and material handling, preparation, product handling, packing and storage areas)	The standard shall require that the material used within the site buildings and facilities are suitable for the intended purpose.	Yes	The Freshcare standard doesn't explicitly state that materials used must be suitable for intended prupose, however it does state that the facilities must be constructed to minimise the risk of contaminating produce. There is a clear expectation that any unsuitable materials wouyld be highlighted as such during the audit process.	Freshcare Food Safety & Quality Edition 4 (FSQ4.1) - F8 Premises, facilities, equipment, tools, packaging and vehicles - F8.1 (page 25) FSQ4.1 Factsheet - F8 Premises, facilities, equipment, tools, packaging and vehicles 13/5/19- F8.1 - specifically addressed via the use of the terms included " located, designed, constructed and maintained". There is a clear expectation that any unsuitable materials would be highlighted as such during the audit process.	yes	
GMP D 5	Equipment	The standard shall require that equipment is suitably designed for the intended purpose and is used and stored so as to minimise food safety risks.	Yes	Freshcare requires that all equipment, including tools and containers, is designed and maintained so as to minimise food safety risk and the risk of contaminating product.	Freshcare Food Safety & Quality Edition 4 (FSQ4.1) - F8 Premises, facilities, equipment, tools, packaging and vehicles - F8.5 (page 26) FSQ4.1 Factsheet - F8 Premises, facilities, equipment, tools, packaging and vehicles	yes	
GMP D 6	Maintenance	The standard shall require that a system of planned maintenance is in place covering all aspect of the facility which are critical for food safety.	Yes	Freshcare requires that a documented plan of preventative maintenance is followed, to minimise the risk of contaminating produce.	Freshcare Food Safety & Quality Edition 4 (FSQ4.1) - F8 Premises, facilities, equipment, tools, packaging and vehicles - F8.10 (page 28) FSQ4.1 Factsheet - F8 Premises, facilities, equipment, tools, packaging and vehicles Form - F8 Preventative maintenance plan	yes	
GMP D 7	Employee facilities	The standard shall require that employee facilities are designed and operated so as to minimise food safety risks.	Yes	Freshcare requires that toilets and hand washing facilities are located to minimise the risk of contaminating produce and maximise accessibility; with appropriate infrastructure to minimise the risk of contaminating produce directly or indirectly.	Freshcare Food Safety & Quality Edition 4 (FSQ4.1) - F8 Premises, facilities, equipment, tools, packaging and vehicles - F8.3 (page 26) FSQ4.1 Factsheet - F8 Premises, facilities, equipment, tools, packaging and vehicles	yes	
GMP D 8	Physical, chemical and biological product contamination risk	The standard shall require that appropriate facilities and procedures are in place to control the risk of physical, chemical or biological contamination of product.	Yes	All aspects of F2 - Growing site and F8 - Premises, facilities, equipment, tools, packaging and vehicles, are focussed on controling the risk of product contamination.	Freshcare Food Safety & Quality Edition 4 (FSQ4.1) - F8 Premises, facilities, equipment, tools, packaging and vehicles - F8.10.2 (page 28) FSQ4.1 Factsheet - F8 Premises, facilities, equipment, tools, packaging and vehicles F9 - Animals and Pests Form - F8 Cleaning plan	Yes	
GMP D 9	Segregation and cross- contamination	The standard shall require that procedures are in place to prevent contamination and cross-contamination of raw materials, packaging and finished product, covering all aspects of food safety.	Yes	All aspects of F2 - Growing site and F8 - Premises, facilities, equipment, tools, packaging and vehicles, are focussed on controling the risk of product contamination, either directly or through cross contamination.	Freshcare Food Safety & Quality Edition 4 (FSQ4.1) - F8 Premises, facilities, equipment, tools, packaging and vehicles - F8.10.2 (page 28) FSQ4.1 Factsheet - F8 Premises, facilities, equipment, tools, packaging and vehicles Form - F8 Cleaning plan	yes	
GMP D 10.1	Housekeeping, cleaning and hygiene	The standard shall require that documented standards of housekeeping, cleaning and hygiene are maintained at all times and throughout all the stages.	Yes	Freshcare requires that a documented plan is followed for cleaning of all produce handling and storage areas and associated infrastructure, to minimise the risk of contaminating produce.	Freshcare Food Safety & Quality Edition 4 (FSQ4.1) - F8 Premises, facilities, equipment, tools, packaging and vehicles - F8.10.2 (page 28) FSQ4.1 Factsheet - F8 Premises, facilities, equipment, tools, packaging and vehicles Form - F8 Cleaning plan	yes	
GMP D 10.2	Housekeeping, cleaning and hygiene	The standard shall require that cleaning materials shall be suitable for their intended use and stored appropriately.	Yes	Freshcare requires that cleaning materials / products are appropriate for use in a food handling area, are used in accordance with label instructions and stored and managed to minimise the risk of contaminating produce.	Freshcare Food Safety & Quality Edition 4 (FSQ4.1) - F8 Premises, facilities, equipment, tools, packaging and vehicles - F8.10.3 and F8.10.4 (page 28) FSQ4.1 Factsheet - F8 Premises, facilities, equipment, tools, packaging and vehicles	yes	

GMP D 11	Stock management	The standard shall require that a system is in place to ensure that materials and ingredients are used in the correct order and within the allocated shelf life.	Yes	The management of inputs such as packaging is controlled through F11 Suppliers and purchase and compliance records are kept. If a product had a nominated shelf life, that should be noted at receival. In F8, the focus of the Freshcare standard is on minimising the risk of packaging and associated inputs contaminating produce.	Freshcare Food Safety & Quality Edition 4 (FSQ4.1) - F8 Premises, facilities, equipment, tools, packaging and vehicles - F8.7 (page 28) and F11 Suppliers F11.1 (page 31) FSQ4.1 Factsheet - F8 Premises, facilities, equipment, tools, packaging and vehicles FSQ4.1 Factsheet - F11 Suppliers To be addressed in standard review process, for inclusion in updated standard 13/5/19 - As the scope of operations related to fresh produce handling and packing, there is a limited requirement for "ingredients" and the other likely material of concern would be post harvest chemicals (fungicides etc) and packaging materials. The handling of chemicals and the requirement of them to be controlled is defined under F4.2 Store, manage and dispose of chemicals to minimise the risk of contaminating produce., specifically F4.2.4.5 Stored chemicals are checked at least annually to identify and segregate chemicals for disposal that have: • exceeded the label expiry date • exceeded the permit expiry date • had their registration withdrawn • containers that are leaking, corroded or have illegible labels. packaging materials, by their nature do not have an shelf life, and therefore there would be no specific need for a check against this. However F8.7 Manage packaging materials to minimise the	Yes	
GAP D 12	Water quality and utility management (including ice)	The standard shall require that the quality of water (including steam and ice) that comes into contact with food are regularly monitored and shall present no risk to food safety.	Yes	Freshcare requires that all postharvest water is managed to minimise the risk of contaminating produce. Aside of pre-wash water (soil / debris removal) all postharvest water must meet the stated limit of E.coli<1 cfu/100ml. Where water is treated to meet the stated limit, water treatment monitoring records must be maintained. Appendix A-F6 details the testing regime to demonstrate compliance.	Freshcare Food Safety & Quality Edition 4 (FSQ4.1) - F6 Water F6.3 (page 22) and Appendix A-F6 FSQ4.1 Factsheet - F4 Water 13/5/19 - addressed as amended wording in F6.4. F6.4.1.1 Water used for hand washing is suitable for the intended purpose and not a source of food safety risk, and meets, or is treated to achieve, E. coli <1 cfu/100mL. Evidence is kept. Where water is not proven to meet E. coli <1 cfu/100mL an alcohol-based hand sanitiser must be used after washing hands with soap and water. (See Appendix A-F6). F6.4.2.1 Water used for cleaning equipment, containers or other produce contact surfaces is suitable for the intended purpose and not a source of food safety risk, and meets, or is treated to achieve, E. coli <1 cfu/100mL. Evidence is kept. (See Appendix A-F6). F6.4.3.1 Any variations to water quality must be supported by a risk assessment and associated documentation and be verified at audit. Feedback from Dr Robert Premier (Freshcare's microbiologist) re. why our critical limit is E coli: E. coli, listeria and salmonella are enteric bacteria which come from the gut of warm blooded animals (and reptiles – as a carrier). Of the three micro-organisms, E coli is the best organism to test for as it lasts longer and will be in larger quantities, therefore more likely to be detected. If there is no E coli, you won't find salmonella or listeria. The test for E. coli is also the most cost effective indicator test. Note : WHO Guideline Value is for E Coli and is 0/100ml, no other organism (related to water hygiene – Coliforms (total), Enterococci (Faecal Streptococci) are noted as guidance values (Ref: A global overview of national regulations and standards for drinking-water quality © World Health Organization 2018)	yes	
GAP D 13	Water for primary production	The standard shall require that, if agricultural water is stored, tanks, containers or cisterns must not be a source of contamination for water or product.	Yes	Freshcare requires that all water storage and delivery infrastructure is constructed, maintained and cleaned to ensure it is not a source of contamination of water or product.	Freshcare Food Safety & Quality Edition 4 (FSQ4.1) - F6 Water F6.1 (page 22) FSQ4.1 Factsheet - F4 Water	yes	
GAP D 14	Waste management	The standard shall require that adequate systems are in place for the collation, collection and disposal of waste material.	Yes	Freshcare requires that all waste is managed and appropriately disposed of, to minimise the risk of conntaminating produce. Notifiable waste such as unuseable chemicals and chemical containers must be legally disposed of through registered collection agencies or approved off-farm disposal ares, with a record of disposal kept.	Freshcare Food Safety & Quality Edition 4 (FSQ4.1) - F8 Premises, facilities, equipment, tools, packaging and vehicles - F8.11 (page 28) and F4 Chemicals - F4.2.6 (page 16) FSQ4.1 Factsheet - F8 Premises, facilities, equipment, tools, packaging and vehicles FSQ4.1 Factsheet - F4 - Chemicals	yes	
GAP D 15	Pest control	The standard shall require that a system is in place for controlling or eliminating the risk of pest infestation at the site or in the facilities.	Yes	Freshcare requires that measures are taken to minimise animal and pest presence in and around areas where produce is grown, packed and stored. A documented plan is developed, implemented and monitored to manage pests, with a record kept.	Freshcare Food Safety & Quality Edition 4 (FSQ4.1) - F9 Animals and pests (page 29) FSQ4.1 Factsheet - Animals and pests Form - F9 Pest management plan Form - F9 Pest monitoring record	yes	
GMP D 16	Transport	The standard shall require that all containers and vehicles, including contracted out vehicles, used for the storage and transportation of raw materials (including packaging), intermediate / semi-processed product and finished product (including packed, fresh product in final packaging) are suitable for the purpose, are maintained in good repair and are clean.	Yes	Freshcare requires that transport vehicles are managed to minimise the risk of contaminating produce, either directly or indirectly.	Freshcare Food Safety & Quality Edition 4 (FSQ4.1) - F8 Premises, facilities, equipment, tools, packaging and vehicles - F8.9 (page 27) FSQ4.1 Factsheet - F8 Premises, facilities, equipment, tools, packaging and vehicles	yes	
GMP D 17.1	Personal hygiene, protective clothing and medical screening	The standard shall require that documented personal hygiene standards based on risk of product contamination are in place and personnel are trained in them.	Yes	Freshcare requires that written food safety instructions are communicated to workers and visitors to minimise the risk of chemical, microbial and physical contamination of produce. The instructions form the basis of 'basic food safety training' delivered to all workers before commencing employment (records kept). The training is reinforced through signage and pictirial guides. Compliance is monitored.	Freshcare Food Safety & Quality Edition 4 (FSQ4.1) - F10 People F10.1 (page 30) and F3 Training M3.2 (page 9) FSQ4.1 Factsheet - F10 People FSQ4.1 Factsheet - M3 Training Form - F10 Food Safety Instructions Form - M3 Training record - internal FSQ	yes	
GMP D 17.2	Personal hygiene, protective clothing and medical screening	The standard shall require that hand washing and toilet facilities shall be provided.	Yes	Freshcare requires that adequate toilet and hand washing facilities are provided, are designed and located to minimise the risk of contamination of produce and are easily accessible to all workers	Freshcare Food Safety & Quality Edition 4 (FSQ4.1) - F8 Premises, facilities, equipment, tools, packaging and vehicles - F8.3 (page 26) FSQ4.1 Factsheet - F8 Premises, facilities, equipment, tools, packaging and vehicles	yes	

GMP D 17.3	Personal hygiene, protective clothing and medical screening	The standard shall require that suitable and appropriate protective clothing shall be provided.	Yes	Freshcare requires that all workers comply with the requirements of the 'food safety instructions', however there is no mandatory requirement for protective clothing. Personal clothing will be covered by protective clothing if there is a risk of contaminating produce. Disposable gloves (if worn) must be changed regularly.	Freshcare Food Safety & Quality Edition 4 (FSQ4.1) - F10 People F10.1 (page 30) FSQ4.1 Factsheet - F10 People Form - F10 Food Safety Instructions Not currently a requirement to provide protective clothing in Australia 13/5/19 addressed via the provision of a documented work instruction example under M2.2 for handwashing as well as F10.1, (page 31) specifically 10.1.1.1 Written food safety instructions are provided to workers and visitors and must include requirements for: • health status • personal hygiene • hand washing • management of clothing and personal items • use of protective clothing (where necessary) • general behaviour.	Yes	
GMP D 17.4	Personal hygiene, protective clothing and medical screening	The standard shall require that a medical screening procedure shall be in place to identify conditions impacting food safety subject to legal restrictions in the country of operation.	Yes	Medical screening is not a requirement of the Freshcare Standard. Information re. health status is provided at training and the Food Safety Instructions clearly state 'workers and visitors must - report gastric illness or communicable disease to relevant manager and do not handle produce if suffering from these illnesses.	Freshcare Food Safety & Quality Edition 4 (FSQ4.1) - F10 People F10.1 (page 30) FSQ4.1 Factsheet - F10 People Form - F10 Food Safety Instructions 13/5/19 -addressed in F10 (page 31); specifically F10.2.1.1 Entry is restricted to authorised persons. F10.2.2.1 Workers or visitors known, or suspected to be suffering from or to be a carrier of a disease or illness likely to be transmitted through fresh produce: • must report to management • are not permitted to handle produce • are not permitted to enter food handling areas.	Yes	
GMP D 17.5	Personal hygiene, protective clothing and medical screening	The standard shall require that in all cases the requirements described under GMP D 17.1, 17.2, 17.3 and 17.4 shall also apply to contractors and visitors.	Yes	Freshcare requires both workers and visitors comply with the requirements as listed. Freshcare defines workers as 'all people working in the business, including family members, staff and contractors working on the property or in the business'.	Freshcare Glossary - page 41 : definition of workers (page 45)	yes	
GMP D 18	Training	The standard shall require that a system is in place to ensure that all employees are adequately trained, instructed and supervised in food safety principles and practices, commensurate with their activity.	Yes	Freshcare requires that a management representative completes approved Freshcare Food Safety & Quality training. Training is delivered to all workers who complete tasks relevant to cpde of practice, to ensure a base level of food safety awareness. In addition, written food safety instructions are communicated to workers and visitors. The instructions form the basis of 'basic food safety training' delivered to all workers before commencing employment (records kept). The training is reinforced through signage and pictirial guides. Compliance is monitored.	Freshcare Food Safety & Quality Edition 4 (FSQ4.1) - F10 People F10.1 (page 30) and F3 Training M3.2 (page 9) FSQ4.1 Factsheet - F10 People FSQ4.1 Factsheet - M3 Training Form - F10 Food Safety Instructions Form - M3 Training record - internal FSQ Form - M3 Training record - Other	yes	
GMP D 19.1	Packing and storage of product	The standard shall require that packaging materials are obtained with knowledge of the manufacturer, are appropriate for use and are used and stored so as not to be a source of contamination to product.	Yes	Freshcare requires that packing materials used are sourced from approved suppliers, are food grade and are stored in a manner that minimises the risk of contamination of produce.	Freshcare Food Safety & Quality Edition 4 (FSQ4.1) - F8 Premises, facilities, equipment, tools, packaging and vehicles - F8.7 (page 27) and F11 Suppliers F11.1 (page 31) FSQ4.1 Factsheet - F8 Premises, facilities, equipment, tools, packaging and vehicles FSQ4.1 Factsheet - F11 Suppliers 13/5/19 - F11 -factsheet Suppliers - the requirements for purchasing packaging materials includes the requirement: Independent evidence of compliance – this may include evidence of Certification, Certificates of Analysis, Statements of Compliance, etc. and if identified as an input material or service that may introduce a food safety risk, purchase records must be kept. And the cross reference to additional requirements for packaging materials (page 6) specifically includes • Ensure packaging is made of substances that are non-toxic and are food grade, compliant with relevant statutory/regulative/customer requirements. • Ensure packaging is clean and free of foreign objects and pest infestation prior to delivery. • Advise if you are aware that any products used contain or have been in contact with known allergens. • If entering site, abide by food safety instructions when handling produce or entering growing, storage and packing areas. we feel that this is suitable to meet the intent.	Yes	
GMP D 19.2	Packing and storage of product	The standard shall require that products shall be handled, sorted, graded and packed in a manner that minimises sources of biological, chemical and physical contamination.	Yes	All aspects of the Freshcare food safety and quality standard (FSQ4) are focussed on controling the risk of product contamination. Element F8 focuses on the facilities and infrastructure to ensure products are handled in such a way to minimise sources of contamination.	Freshcare Food Safety & Quality Edition 4 (FSQ4.1) - ALL and F8 Premises, facilities, equipment, tools, packaging and vehicles (page 25) FSQ4.1 Factsheet - F8 Premises, facilities, equipment, tools, packaging and vehicles F8.2 is a specific element added at the request of retail stakeholders, for higher care handling of product direct to retail i.e. not repacked. 13/5/19 -addressed under F8.1.1 Produce growing, handling, packing (including in-field packing) and storage facilities are located, designed, constructed and maintained (interior and exterior) to	yes	
GMP D 19.3	Packing and storage of product	The standard shall require that products shall be held or stored in designated areas and handled under the proper conditions to minimise contamination.	Yes	Freshcare requires that product is not stored with or near materials that may present a risk of contaminating produce (F8.1.8 and F8.2.1). In addition, cooling systems are constructed and maintained to minimise the risk of contaminating produce (F8.8)	Freshcare Food Safety & Quality Edition 4 (FSQ4.1) - ALL and F8 Premises, facilities, equipment, tools, packaging and vehicles F8.1.8 (page 25) and F8.8 (page 27) FSQ4.1 Factsheet - F8 Premises, facilities, equipment, tools, packaging and vehicles Form F8 - Facilities audit checklist	yes	

Part III – D – Pre-processing Handling of Plant Products

SECTION 4: CERTIFICATION OF MULTI-SITE ORGANISATIONS BASED ON SAMPLING

Clause Number	Clause Name	Certification Programme Application Requirement	Compliant?	Certification Programme Information - Narrative text	Supporting Documentation Reference	FOR GFSI only	FOR GFSI only
						Compliant	Feedback GFSI
MSS 1.1	General requirements	Certification Programmes requiring Certification Bodies to operate to ISO / IEC 17021-1 shall meet or exceed the requirements of Clause 9.1.5 of ISO / TS 22003. Certification Programmes that require Certification Bodies to operate under ISO / IEC 17065:2012 shall meet or exceed the principles defined in IAF MD1 current version, and must, as a minimum, apply the GFSI Benchmarking Requirements Part III, sections MSS, clauses 4.2 and 4.3 below.	Yes	Freshcare does not currently provide a multi site certification option. Where a single Freshcare business has multiple (common ownership) sites as part of a single operational business, this is managed under the guidance of the Freshcare Rules (3.0 Sites) and treated in the same way as multiple production sites on a single property.	Freshcare Rules - Version 4.3 - July 2019 - 3.0 Sites (page 5) 3.1.1 All sites to be included under the scope of Freshcare certification must be disclosed on the Freshcare registration form and on application for audit. A site is considered anywhere that fresh produce is produced, handled or stored (including, but not limited to, fields, paddocks, orchards, greenhouses, shade houses and growth rooms/chambers, packing facilities, ripening facilities, off site storage etc). 3.2.1 Multiple sites may be registered under a single Freshcare registration only if they operate under a single management system and geographically allow (approx. 50km/ 1-hour travel) for all sites to be visited as part of a single reported audit. 3.3.1 When multiple sites are included under a single Freshcare registration: i. All sites must be visited at the initial Freshcare audit; ii. For the recertification audits: a. All sites with input storage and handling and/or product storage and packing activities must be visited; b. For the remaining growing only sites, the Certification Body will select a representative sample of these sites for audit, based on risk, and to ensure all growing only sites are visited across a three-year period; iii. Additional sites to be added to the list of a business's registered sites must be audited prior to inclusion on a Freshcare certificate and subsequently meet Clause 3.3.ii. 3.4.1 Businesses with multiple sites that operate under different Management Systems or are in geographically distant locations, are required to register each site with Freshcare separately. 3.5.1 Multiple businesses that operate from one site (address) must be registered with Freshcare separately. A Freshcare audit must be scheduled for each individual business, but the audits may be conducted consecutively.	yes	No sampling of multi site organisations. All sites must be visited at inital audit. All sites with infrastructure (including but not limited to packing facilities, chemical sheds, water sources, storage of product etc.) must be visited at recertification audit. All growing sites must be audited within a 3 year cycle . Additional sites to be added to the list of a business's registered sites must be audited prior to inclusion on a Freshcare certificate
MSS 1.2	General requirements	The Certification Programme Owner shall clearly specify the conditions for a multi-site sampling.	NA				
MSS 1.3	General requirements	The Applicant shall request multi-site sampling in their application for certification to the Certification Body. The central function, not the individual sites, shall be contracted to the Certification Body.	NA				
MSS 1.4	General requirements	The central function shall be included in the scope of the certification.	NA				
MSS 1.5	General requirements	The central function shall be audited by the Certification Body at least annually and before the Certification Body undertakes the auditing of sample sites.	NA				
MSS 1.6	General requirements	All sites must be operated under the same Food Safety Management System and under the control of the central function.	NA				
MSS 1.7	General requirements	There shall be a legal or contractual link between the sites and the central function.	NA				
MSS 2.1	Central function	There shall be a clearly defined central function to ensure management commitment to the system / integrity and clearly describe the roles and responsibilities of management, internal auditors and other members of the organisation.	NA				
MSS 2.2	Central function	The central function shall have an effective customer complaint procedure.	NA				
MSS 2.3	Central function	The central function shall have authoritative control of the Food Safety Management System of all sites within the certification and shall issue, maintain and retain all relevant documents relating to the sites within the programme.	NA				
MSS 2.4	Central function	The central function shall have in place sufficient management and technical capacity to implement and maintain the internal audit programme.	NA				
MSS 2.5	Central function	The central function shall manage and maintain relations with the sites for the activities related to the scope of certification.	NA				
MSS 2.6	Central function	The central function shall be subject to management review in accordance with Certification Programme requirements and shall be itself subject to internal audit.	NA				
MSS 3.1	Internal audit	An internal audit programme shall be in place and undertaken by the central function. This programme shall ensure an annual audit of all sites, the central function and the management system.	NA				
MSS 3.2	Internal audit	The internal audit programme shall have documented procedures and be both practical and feasible in operative terms.	NA				
MSS 3.3	Internal audit	Clear requirements for internal auditors and technical reviewers shall be defined and documented. Internal auditors shall be suitably trained and qualified to carry out internal audit. Their qualifications shall be assessed annually by the Certification Body.	NA				
MSS 3.4	Internal audit	Internal auditors shall be regularly evaluated, calibrated and monitored.	NA				
MSS 3.5	Internal audit	Certification Programme Owners may require the organisation's internal auditors to successfully complete the Certification Programme Owner's specific auditor training.	NA				
MSS 3.6	Internal audit	Internal auditors shall be assigned to sites to ensure impartiality.	NA				
MSS 4.1	Site audit sampling	Certification Programme Owners shall have a system in place for the Certification Body to define a risk-based sampling programme.	NA				
MSS 4.2	Site audit sampling	High risk sites shall be included in the yearly audit plan.	NA				

MSS 4.3	Site audit sampling	Certification Programme Owners shall ensure that the Certification Body audit a sample of the sites every year.	NA				
MSS 4.4	Site audit sampling	The annual sampling size of the Certification Body audit sampling programme shall be the square root of the number of sites (rounded to the upper whole number) in accordance with principles defined in IAF MD1 current version.	NA				
MSS 4.5	Site audit sampling	The programme shall be partly selective and partly non- selective, but at least 25% of the sample shall be randomly selected from the total number of sites. In relation to the selected sites, these shall be identified based on the organisation's internal audit programme findings and the individual site risk profiles.	NA				
MSS 5.1	Management of non-conformities and certification	Non-conformities found on sites shall be assessed to ascertain if these indicate an overall Food Safety System deficiency and therefore may be applicable to all or other sites. If non-conformities relate to all or other sites, corrective action shall be undertaken and verified both by organisation and by the Certification Body.	NA				
MSS 5.2	Management of non-conformities and certification	In the event that non-conformities are found when auditing sites, which may not jeopardise certification but may raise concerns on conformity of the organisation, the Certification Body shall increase the sample size to ensure adequate confidence in the conformity of the organisation.	NA				
MSS 5.3	Management of non-conformities and certification	If the organisation, or any site fails to meet the critical Certification Programme requirements, then the whole organisation, including all sites, will fail to gain certification. Where certification has previously been in place, this shall initiate the Certification Body's process to suspend or withdraw its certification.	NA				