



GFSI BENCHMARKING REQUIREMENTS

# VERSION 2020 NOTIFICATION OF AMENDMENTS

*This document records amendments to the GFSI Benchmarking Requirements that do not require the issuing of a new version or subversion of the GFSI Benchmarking Requirements, such as removal of obsolete key elements, spelling and grammatical amendments, rephrasing of key element(s) to clarify the intent or formatting.*

*It also documents decisions from any GFSI committees or subcommittees affecting the application of the GFSI Benchmarking Requirements, including appeals decisions. This document is part of the GFSI Benchmarking Requirements and should be read in conjunction with them.*

## **17/12/2021 - Appeals committee decision - completion of audit checklist**

GFSI received an appeal on 8th December 2021 from a CPO against the application of key elements II 5.2 and 5.25:

- The Benchmarking Requirements state that “all applicable requirements of the Certification Programme shall have been fully covered”
- In instances where activities did not occur during the audit due to seasonality, the certification programme’s rules stated that the sections of the standard covering those activities should not be completed; this would lead to a certificate issued against an incomplete checklist
- The CPO provided evidence of how they mitigated this challenge in their certification programme rules, including ensuring that those unaudited sections were audited at the next audit.

Reading the above, GFSI understood that the CPO was not appealing against the decision of the Benchmark Leader, but against the GFSI Benchmarking Requirement itself.

The appeal was not progressed.

## **13/09/2021 - Appeals committee decision - application of version 2020 part III FSM 5.6 - unannounced audits**

GFSI received an appeal on the 29th July from a CPO against the application of key element III FSM 5.6, and the Appeals Committee decision dated 1st July 2021 to the Aquaculture scope. The CPO provided evidence of the difficulties of organising unannounced audits without any notification to aquaculture operations.

Reviewing the appeal, the GFSI director concluded that it constituted an appeal against a previous decision made by the GFSI Appeals Committee which is final and for which no further appeal process is available as per the GFSI Benchmarking Process.

GFSI did, however, refer the matter to the GFSI appeals committee for the purpose of informing them of this attempt to further appeal against their previous decision and to highlight the additional details provided in this appeal. The Appeals Committee reviewed this additional information and reiterated the following;

- the current target of 10% of unannounced audits in all primary scopes, including aquaculture, leaves the option of announced audits for 90% of certified farms. In their view, this caters for the sites where an unannounced audit may be truly and practically impossible.
- The constraints laid out in the appeal letter represented similar challenges to those in terrestrial farming, debated during the appeal rejected on the 1st July on the same key element.

The Appeals Committee concluded that the current requirement was achievable in Aquaculture, and upheld their decision dated 01/07/2021.

## 22/07/2021 - confirmation that FSM16.2 applies to scope G

The GFSI CoA team confirms that element FSM16.1 (allergen management) does not apply to scope G; element FSM 16.2 (allergen management) applies instead.

- FSM16.1: An allergen management plan shall be established, implemented and maintained. This shall include a risk assessment of allergen cross contamination, implemented controls to reduce or eliminate that risk, and labelling of the food in compliance with the allergen labelling legislation in the country of intended sale.
- FSM16.2: An allergen management plan shall be established, implemented and maintained. This shall include a risk assessment of allergen cross contamination, implemented controls to reduce or eliminate that risk.

## 12/07/2021 - GFSI transition to new rules of governance

On the 23rd March 2021, GFSI formally transitioned to a new set of rules of governance as it officially became a Coalition of Action. Following this transition, the GFSI Board was replaced with a GFSI Steering Committee. Thus, throughout the GFSI Benchmarking Requirements, “GFSI Board” should now be understood as the “GFSI Steering Committee”.

## 01/07/2021 - Appeals committee decision - application of version 2020 part III FSM 5.6 - unannounced audits

GFSI received an appeal on the 28th May from a CPO against a finding raised during the assessment of their Certification Programme:

- The GFSI Benchmarking Requirements version 2020 part II FSM 5.6 states: "the Certification Programme Owner shall ensure that Certification Bodies perform at a minimum: - for scopes AI, AII, BI, BII and BIII: 10% of audits unannounced per year or one audit every 4 years for each certified organisation; - for scopes CO, CI, CII, CIII, CIV, DI, E, FI, G, H, JI, K and I: one audit unannounced every 3 years for each certified organisation."
- The Benchmark Leader raised the following non-conformity: "up to 48hrs notice can be provided for an unannounced audit, due to the agricultural and remote issues of clients."
- The CPO gave evidence of the challenges that giving no notice in the agricultural sector could represent in their appeal letter to justify their appeal.

Reading the above, GFSI understood that the CPO was not appealing against the decision of the Benchmark Leader, but against the GFSI Benchmarking Requirement itself. However, in light of previous tolerance on alignment against this specific key element in the primary production sector, GFSI appointed the Technical Sub-Committee as an Appeals Committee.

The Appeals Committee concluded that they would uphold the decision of the incumbent GFSI Technical Committee dated 22nd January 2021:

*“an unannounced audit should be unannounced with no notice at all. Sites and CBs should have a mechanism in place for the site to inform the CB when they are active and when not. In this way, a window for auditing would be defined, but the audit itself would still be unannounced.”* (minutes of the GFSI Technical committee meeting 22nd January 2021)

The Appeals Committee rejected the appeal. The GFSI Steering Committee upheld the Appeals Committee decision.

## **16/06/2021 - Appeals committee decision - application of version 2020 part III FSM13.5 - certified sources of feed**

GFSI received an appeal on the 28th May from an applicant CPO against a finding raised during the assessment of their Certification Programme:

- The GFSI Benchmarking Requirements version 2020 part II FSM13.5 state: "specific provisions shall be in place for the procurement of feed from approved, certified sources"
- The Certification Programme requirement allowed for a 12-month period before the source of the feed should be certified.

Reading the above, GFSI understood that the CPO was not appealing against the decision of the Benchmark Leader, but against the GFSI Benchmarking Requirement itself. GFSI therefore confirmed that the key element FSM13.5 of the GFSI Benchmarking Requirements applies to all CPOs applying for recognition against the All scope of the GFSI Benchmarking Requirements version 2020.

The appeal was not progressed.

## **23/02/2021 - Appeals committee decision - application of eligibility criteria for re-benchmarking - 10 accredited certificates**

GFSI received an appeal from a CPO on the 19th February 2021 against the decision from the GFSI Coalition Team:

- The GFSI Benchmarking Requirements version 2020 part I section 1: eligibility criteria state that "applicant Certification Programme Owners are required to satisfy the below eligibility criteria:
  - the Certification Programme Owner has in place ten valid accredited certificates for each GFSI scope of recognition included in the application, "
- The Appealing CPO submitted 10 certificates for each scope of recognition included in their application to GFSI issued against the previous version of their Certification Programme to the version submitted to GFSI assessment.
- GFSI accepted the CPO application referring to a COVID19 concession from the GFSI Technical Committee and dated June 2020 "waiving the need for the 10 certificates at the time of application if needs be"
- GFSI then required the CPO to comply with the eligibility criteria and present 10 valid certificates issued against the version of their Certification Programme being assessed for the Benchmarking Process to be completed

Reading the above, GFSI considered that the CPO was not appealing against a decision from GFSI but against applicable requirements. GFSI confirmed that 10 valid certificates against each of the scopes included in their application would be required from any applicant CPOs to complete the Benchmarking Process. Besides, the appeal was sent to GFSI more than 30 days after GFSI took their decision and informed the CPO of it, which was against the current GFSI Benchmarking Process.

The appeal was not progressed.

## **20/11/2020 - Appeals committee decision - application of version 2020 part II 5.25 - addressing non-conformities before certification**

On the 2nd September 2020, GFSI received an appeal against a decision of their Benchmark Leader to raise a finding against key element 5.25 in part II of the GFSI Benchmarking Requirements:

- II 5.25 “the Certification Programme Owner shall ensure that Certification Bodies perform a thorough technical review of each audit prior to granting, suspending, withdrawing or renewing certification. For the review process to be effective it shall ensure that
  - [...] all areas of non-conformity have been identified and effective corrective actions have been completed and verified to resolve these non-conformities”
- The CPO allowed for a small proportion of non-conformities to be left open at the time of certification, due to the very prescriptive nature of their standard.
- The CPO confirmed that all the closure of those non-conformities was verified during the following audit

The Appeals Committee stated that, as per key elements II 5.24 and 5.25, Non-Conformities against clauses addressing GFSI Benchmarking Requirements must be closed before certification. Any clauses of the standard unrelated to the GFSI Benchmarking Requirements may be handled whichever way the CPO finds more suitable.

The Appeals Committee therefore rejected the appeal. The GFSI Steering Committee upheld the Appeals Committee decision.

## 04/06/2020 - Removal of the requirements related to the GFSI Knowledge Exam

Part II key elements 4.17 to 4.26 as listed below are not applicable anymore.

CLAUSE NUMBER	CLAUSE NAME	REQUIREMENTS
4.17	GFSI Knowledge Exam	<p>The Certification Programme Owner shall implement a means to ensure that all new auditors have successfully completed the relevant GFSI Knowledge Exam for pre and / or post farm gate. A current valid record to demonstrate successful completion of the relevant GFSI Knowledge Exam shall be available from an examination provider that meets the below requirements:</p> <ul style="list-style-type: none"> <li>• The examination provider shall not be from a product, process, service, and management system Certification Body or an Accreditation Body;</li> <li>• The exam provider may be the Certification Programme Owner or a third party independent from the auditor;</li> <li>• The exam provider may offer the GFSI Knowledge Exam provided they demonstrate conformance to the requirements defined in this clause.</li> </ul>
4.18	GFSI Knowledge Exam	<p>The examination provider shall have procedures in place to manage the exam questions and answers in alignment with the relevant clauses of the ISO / IEC 27001 Information Security Management System requirements as stated below to ensure the integrity and security of the questions, exam, process and compliance to applicable data privacy regulations for all exam types being delivered (electronic, paper, etc.):</p> <ul style="list-style-type: none"> <li>• Documented procedures shall be in place to ensure that the exam questions and standard answers shall be treated confidentially. These should include provisions for the security of the exam questions during the exam process, preventing unauthorised copies and print-outs of the exam questions and standard answers, and communication about the exam questions and standard answers with unauthorised personnel. If the exam is being provided in paper, the security of how the exam is transported and stored shall be documented;</li> <li>• Documented procedures shall be in place to ensure that the exam questions and standard answers are not shared with external / third party, unless those can demonstrate compliance to the GFSI Benchmarking Requirements related to the GFSI Knowledge Exam;</li> </ul>

**4.18** GFSI Knowledge Exam

- Documented procedures shall be in place to ensure access to the exam questions and standard answers is restricted to authorised personnel. Consideration shall be taken for office housekeeping, computer security best practices, and management and secured storage of any copies of the set of questions or devices containing them;
- Documented procedures shall be in place on the delivery of the results of the candidate exam results for analysis and item performance.

**4.19** GFSI Knowledge Exam

The examination provider shall manage the exam process in conformance with the relevant clauses of ISO / IEC 17024 as stated below:

- Documented procedures shall be in place for the roles and responsibilities of examination administrators to ensure individuals are trained in administering the examination;
- Procedures shall be in place to prevent fraudulent exam practices, including requiring candidates to sign a non-disclosure indicating their commitment to not release confidential examination materials or participate in any fraudulent activities;
- The presence of an authorised, competent and trained proctor shall be required;
- Access shall be prevented to any unauthorized aids or materials;
- Results shall be monitored for indicators of cheating.

**4.20** GFSI Knowledge Exam

The examination provider shall access and use the latest GFSI-approved exam question and answer sets for pre and / or post farm gate appropriately associated with the domains to be tested, and shall have a procedure in place to demonstrate the management of the versions. Examination results shall be reported back to GFSI's designated examination development provider that includes the results of all responses within the exam so that item performance can be analysed.

**4.21** GFSI Knowledge Exam

GFSI provides the exam questions and standard answers in English. If the auditor completes the exam in a different language, the Certification Programme Owner shall be able to demonstrate how the integrity of the questions and evaluation was preserved during the translation.

**4.22** GFSI Knowledge Exam

The exam process shall be managed to ensure that:

- The credentials of the candidate match the candidate name;
- The correct time is allowed to complete the exam
- The exam is delivered in the chosen language of the candidate;

4.22	GFSI Knowledge Exam	<ul style="list-style-type: none"> <li>• The exam is supervised (proctored) to comply with clause 4.19</li> <li>• Upon completion, the answer set is identifiable to the candidate and secured from tampering.</li> </ul>
4.23	GFSI Knowledge Exam	<p>The exam candidate's answers to the GFSI exam questions shall be evaluated by authorised, trained and competent personnel using the standard answers provided with the questions and the result assessed against the GFSI designated pass score. If the answers are evaluated automatically, in case of online exam the right algorithm shall be ensured.</p>
4.24	GFSI Knowledge Exam	<p>A record that the candidate has successfully completed the GFSI Knowledge Exam shall be issued to the candidate where applicable. This shall include as a minimum:</p> <ul style="list-style-type: none"> <li>• The name of the examination provider;</li> <li>• The name of the Certification Programme Owner (if different from examination provider);</li> <li>• The name of the candidate;</li> <li>• The question set i.e. pre and / or post farm gate, version number, language;</li> <li>• The result of the examination (pass / fail);</li> <li>• The date of examination;</li> <li>• Issue date of this examination record (and if applicable expiry date);</li> <li>• Contact details of the examination provider;</li> <li>• The document reference number / candidate number.</li> </ul>
4.25	GFSI Knowledge Exam	<p>The exam provider shall maintain full records for each examination / candidate for a minimum period of 5 years or as long as the records relate to the latest examination. This shall include:</p> <ul style="list-style-type: none"> <li>• Candidate full name;</li> <li>• Exam Question set (pre or post farm gate) form version number, language;</li> <li>• Date and place of examination;</li> <li>• Exam conditions, paper/electronic, name and contact details of examination provider;</li> <li>• Information identifying the examination proctor;</li> <li>• Completed examination document;</li> <li>• Exam results including score;</li> <li>• Details of special accommodations, if needed;</li> <li>• Exam record details as per 4.24 above.</li> </ul>
4.26	GFSI Knowledge Exam	<p>Certification Programme Owners shall mutually recognise the positive GFSI exam results of each other's auditors for pre and / or post farm gate.</p>



## Requirements for the Management of Certification Programmes

The TWG is suggesting that the following line is added to table 1: GFSI sector and sub-sector scopes for recognition and the associated competence of auditors

GFSI SCOPE OF RECOGNITION	INDUSTRY SECTOR	REQUIRED EDUCATION	REQUIRED WORK EXPERIENCE
H	Provision of Services to the food industry which have an impact on food safety, quality and legality	<p>A degree in a food-related or bioscience discipline; or, successfully completed a food-related or bioscience higher education course or equivalent.</p> <p>Trained on the food and service specific risk assessments.</p>	<p>The auditor shall have experience in the food sector or relevant service provision.</p> <p>The auditor shall be able to demonstrate an understanding and knowledge of specific categories of service provision for which they are approved.</p> <p>The verification to carry out work within specific categories of service provision will be carried out by the certification body.</p>