STAKEHOLDER CONSULTATION RESPONSE

IMPLEMENTING THE GFSI CONCEPTUAL FRAMEWORK THE 'RACE TO THE TOP'

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The Consumer Goods Forum | July 2020

Contents

Introduction

1.1   For over 20 years, GFSI has presided over a community which delivers food safety assurance through the benchmarking and harmonisation of food safety certification programmes which are recognised as meeting the GFSI Benchmarking Requirements. The GFSI ecosystem relies on multiple actors playing multiple parts in delivering food safety audits and certification upon which the global food industry relies.

1.2   Over the past few years, trust and confidence in third-party certification to deliver food safety assurance has been challenged. The quality of the outputs of some audits leading to certification to a GFSI-recognised Certification Programme has been questioned. There has been an understandable concern about the efficacy of audits and more specifically the competence of some food safety auditors themselves.

1.3   On 5th May 2020, GFSI launched a Stakeholder Consultation on a conceptual framework of four fundamental features designed to improve GFSI oversight over every aspect of the GFSI ecosystem with the aim of improving trust, transparency and confidence in GFSI-recognised certification and audit outcomes.

1.4   In addition, GFSI sought through the framework to redefine its place in the food safety system with the aim of staying true to our original genesis as a benchmarking and harmonisation organisation responsible for the food safety 'what' and not the food safety 'how.'

1.5   The Consultation document is attached in the Appendix.

1.6   The GFSI Team committed to developing and delivering a bold new vision designed to shape what was termed the 'Race to the Top' (RTTT).

We consulted on four specific features of a conceptual framework designed to deliver improvements in the quality and efficacy of all aspects of the GFSI ecosystem.

The conceptual framework includes the following elements;

- **Feature 1**. -Developing harmonisation and benchmarking requirements for providers of food safety auditor training and ongoing Continuing Professional Development (CPD).
- **Feature 2.** - Moving to deliver a process of ongoing assessment and continuous alignment to the GFSI requirements for CPOs.
- **Feature 3.** - Developing a collaborative approach to the management of Certification Bodies between CPOs, Accreditation Bodies and GFSI.

- **Feature 4.** - Developing a certificate platform - enabling access to certificate data of all FBOs certified to a GFSI-recognised programme.

1.7 The Consultation closed at Noon CET on **18th May 2020,** however we received a number of responses after the Consultation closed which we have chosen to include.

1.8 We have considered all of the responses received. This document summarises the responses received and sets out GFSI's response to all features included for consideration in the RTTT Consultation. GFSI believes this provides a transparent and robust basis upon which to shape our activities around the RTTT going forward in consultation with our stakeholders.

1.9 We are extremely grateful to all organisations and individuals who took the time to respond to the Consultation and share with us their thoughts, views and professional insights.

1.10 In this vein, we have taken the challenging and painstaking decision to ensure that each and every comment raised by our stakeholders has been summarised and addressed in the ensuing response document. Taking the additional time to do this we feel will be beneficial to all in the next phases of ongoing engagement with all of our stakeholders, not just those who responded to the Consultation.

1.11 We are humbled by the passion and commitment shown by many consultation respondents in shaping their ideas and offering their support. We are confident that the consultation process has illustrated a firm commitment by all to delivering each of the features of the RTTT at pace and as a community dedicated to delivering improved food safety outcomes.

1.12 For any enquiries on the content of this document please contact gfsibm@theconsumergoodsforum.com

Summary of Responses Received

2.0.   This document sets out a summary of responses to the Consultation.

We received a total of 31 responses to the Consultation. This pie chart illustrates the breakdown of respondents by category.
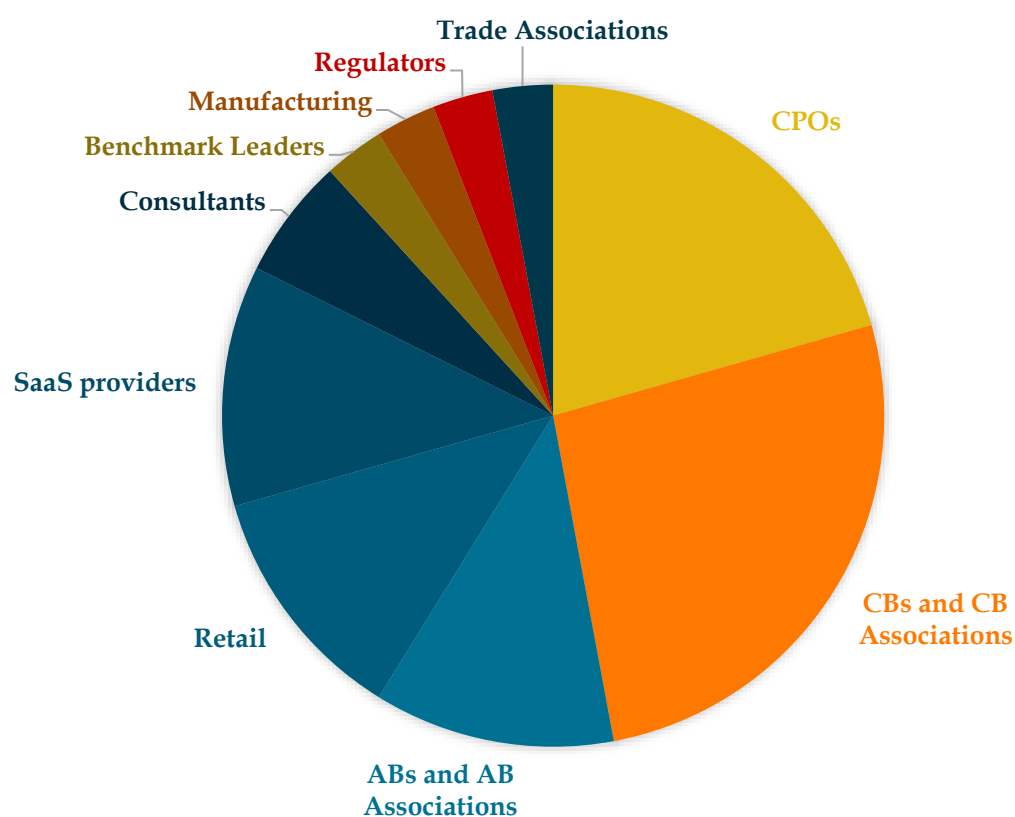
2.2   The table below sets out a breakdown of the classification of the respondents.

Respondent Type	Number of Respondents per Stakeholder Category	Percentage per Stakeholder Category
Certification Programme Owners (CPOs)	7	22.5%
Certification Bodies (CBs) and Certification Body Associations	9	29%
Accreditation Bodies and Accreditation Body associations	4	12.9%

Retailer Businesses	4	12.9%
SaaS Providers	2	6.45%
Consultants	1	3.23%
Benchmark Leaders	1	3.23%
Food Manufacturing Businesses	1	3.23%
Food Safety Regulators	1	3.23%
Food Trade Associations	1	3.23%
Total	**31**	**100%**

1.13   During the Consultation period GFSI also provided a number of direct responses to queries via GFSI web pages and GFSI social media channels.

1.14   Below you will find a high-level summary of the responses received to the Consultation followed by the GFSI response.

1.15   In addition, to ensure that we have addressed the very specific issues raised by stakeholders in response to each proposed feature of the RTTT, we have set out a detailed publication of all comments received from all consultees alongside a stratified GFSI response.

1.16   The stratification method applied to individual responses comprises the following RAG rated approach;

- ●**Misunderstood** - consultee has misunderstood what we are prosing in the Consultation.

- ●**Disagree –** GFSI does not agree with the comment or proposal.

- ●**Risk identified**- will be considered as part of detailed development of the project.

- ●**Agree** – taking forward/ identified benefit (N.B. please note this rating does not mean that ideas presented carry any guarantee of implementation).

- ●**Identified opportunity** - a good idea not related to the RTTT feature but one that GFSI will consider moving forward.

2.6   In the GFSI response sections, 'we' refers to GFSI Paris HQ on behalf of the GFSI Board.

FEATURE 1

RTTT Feature 1.

Developing harmonisation and benchmarking requirements for providers of food safety auditor training and ongoing Continuing Professional Development (CPD)

Summary of responses received to Feature 1.

3.0   The majority of respondents were supportive of this proposal citing many challenges with the existing system of auditor training, competence assessment and ongoing CPD.

3.1   The majority of respondents also noted the very positive role that GFSI could play in supporting the professionalisation of food safety auditing as a career via the mutual development of a professional development framework for auditor training and CPD.

3.2   The majority of respondents made some excellent suggestions as to things that GFSI would need to consider in the design and development of auditor training and CPD Benchmarking Requirements.

3.3.   The majority of respondents indicated that they had expertise and technical knowledge which they could contribute towards the development of this feature of the RTTT.

3.4   Many respondents made references to current existing auditor training and CPD programmes and organisations as examples; many respondents also made references to previous work GFSI carried out in an attempt to address auditor competence.

3.5   A small minority of respondents opposed the idea on the basis that there was nothing wrong with existing arrangements and / or that they did not consider GFSI had a role to play over and above our current Certification Programmes recognition activities.

3.6   Some challenges were raised about the timelines by which GFSI is proposing to deliver this feature, seen as a risk by many respondents to the quality of the deliverables. This was linked to another challenge as to whether the proposed benchmarking requirements would apply to existing as well as new auditors and from what point in time.

3.7   There was some confusion noted in some responses as to the relationship between the existing GFSI Benchmarking Requirements (aimed at Certification Programme Owners) and the proposed Benchmarking Requirements (aimed at training and CPD organisations).

3.8   There were some queries raised about entry requirements for new providers of auditor training products and how open the market could become. This issue was linked to concerns about the quality of new training providers.

3.9　　　The majority of respondents acknowledged the inefficiency and burden of multiple auditor training requirements imposed through the existing GFSI Benchmarking Requirements and agreed that a harmonised approach would be hugely beneficial to the auditors themselves.

GFSI Response

3.10　　　We are pleased to note the high level of support across multiple stakeholder groups for this feature of the RTTT. We thank you for the quality of your input and excellent suggestions of things we need to consider in taking this work forward.

3.11　　　We are also pleased with the positive response we have received to the proposed development of a professional development framework for food safety auditors. GFSI sees this as a critical element in supporting the ongoing sustainability of the food safety auditor community which we recognised is one of the biggest challenges facing the certification industry.

3.12　　　The risks raised in relation to the ambitious timelines have been noted and will be further considered in the development of the initiative with a broad stakeholder group.

3.13　　　We wish to reassure our stakeholders that the 'Race to the Top' framework was built with considerations for the learning and challenges faced during previous GFSI initiatives on the topic of auditor competence.

3.14　　　We hope we have eliminated in Table 1 any confusion in respect of the interrelationships between existing training elements of GFSI Benchmarking Requirements for Certification Programmes and the new GFSI Benchmarking Requirements for training and CPD.

3.15　　　It would be our intention to now convene a multi-stakeholder group to deliver this feature via a call for participation and for the group to be led by an independent expert.

Table 1. A summary of anonymised responses to RTTT Feature 1 is set out below in Table 1 alongside a stratified response from GFSI.

#	Respondent Number	Respondent Type	Summary of Comments	GFSI Response
1.	Number 6.	CPO	"Recommended an assessment process to validate training outcome, and a mechanism for CPOs and CBs to verify the validity of auditor training."	●Agree – taking forward. ●Risk identified- will be considered as part of detailed development of the project.
			"Requested that CPOs be allowed to require additional training for their specific scheme."	●Misunderstood – GFSI Benchmarking Requirements will cover general aspects of food safety auditor training, individual CPOs will be allowed to require any additional training they see

				fit for their specific certification programme.
			"Benchmarking should be designed to cover the training organisation and their associated trainers."	●**Agree** – taking forward.
			"Clarifies transition - will this apply to new auditors only, what about already registered auditors?"	●**Agree** – taking forward.
			"Recommended a working group including CPOs."	●**Agree**- taking forward.
2.	Number 9.	CPO	"Recommendation to align training content to currently require lead auditor training based on ISO standards and HACCP training based on Codex guidelines."	●**Agree**- taking forward.
			"Clarification needed as to who will be the recognised organisations and if it includes scheme-specific training'."	●**Agree**- taking forward. The eligibility criteria for recognition need to be defined. ●**Misunderstood** - the intent is to consider general aspects of food safety auditor training, not certification programme's specific training needs.
			"Concerned that scheme-specific training should be treated separately."	●**Misunderstood** - the intent is to consider general aspects of food safety auditor training, not certification programme's specific training needs.
			"Clarification required on Point 3.3. of the consultation."	●**Misunderstood** - that refers to the establishment of a career roadmap for auditors and people who want to enter the profession, based on their training and experience.
			"Concerned about adding complexity and barriers to entry."	●**Risk identified**- will be considered as part of detailed development of the project. Intent is to simplify, while addressing quality concerns mentioned in 1.2 in an objective manner.
3.	Number 13.	CPO	"The CPD is only going to work if it is available in all countries (and in multiple locations), multiple languages and have a multi-level approach to skills assessment, in that there needs to be recognised trainee level, through to mid experience, through to senior/ master category so that there are several steps and development/ career opportunities for progression."	●**Agree** – taking forward.
			"Based solely on the longer term work that has already been done in this space, the hundreds of hours of work by GFSI groups, the failure of the exam process to meet the needs, it needs to be determined, what are the barriers to success? Why is the current processes under the AB's control - via IAF and ISO standards requirements that are not working?	●**Agree** - we addressed the need to reconcile this challenge in the consultation.

			The development process must address/ fix these questions before it is started."	
4.	Number 14.	CPO	"Establish a curriculum and career path for colleges and universities (e.g. Wageningen University, MSU, etc.) because we have to start with solving the root cause of the problem in the first place."	●**Agree** – taking forward GFSI is developing a professional framework for food safety auditors as part of this feature. ●**Misunderstood**- GFSI cannot refer to specific organisations in our requirements, however university food safety auditor curriculum could be considered as potential candidates for recognition against the new requirements.
			"Work with existing training and CPD providers and CBs to define minimum course content, assessment methodology, etc. for food safety auditors."	●**Agree** – taking forward.
			"Develop benchmarking criteria to be executed by CPOs by referring to existing organisations that already approve training and CPD providers (e.g. IRCA, SAATCA, Exemplar Global, etc.) to prevent re-inventing the wheel again and make what we have more efficient and effective to strengthen food safety."	●**Misunderstood** – GFSI cannot refer to specific organisations in our requirements, however the examples given in your comments could be considered as potential candidates for recognition against the new requirements.
			"Since auditor competence is the combination of knowledge and skills (i.e. application of gained knowledge), the above approach needs to be supplemented by GFSI auditor competence criteria on mutual recognition by CPOs of CB auditor witness audits confirming acceptable application of gained knowledge in the field."	●**Misunderstood** – not a role for GFSI – this is getting into the 'how' by prescribing an auditor witness approach.
5.	Number 18.	CPO	"Please consider a paper that has already been brought to GFSI's attention: Enhancing Trust in GFSI Audits Discussion Paper for GFSI Board-CPO Meeting, January 2020 (Appendix 1)."	●**Agree** – addressed during the consultation.
			"We support this feature. Supportive of the establishment of a curriculum and career path for auditors with university and public training organisations. The best way to do this is to establish a curriculum and career path with universities and other public training institutions. GFSI should partner with academia and develop a food safety auditor curriculum for colleges and universities."	●**Agree** – taking forward. ●**Misunderstood** – this is the objective of programme recognition , however GFSI cannot refer to specific organisations' programme in our requirements.
			"Recommend to recognise different training needs for pre and post farm gate auditor, product and system auditors. Concerned about the additional complexity this will bring."	●**Risk identified** - will be considered as part of detailed development of the project.
			"Issues of anti-trust posed in relation to sharing data	●**Risk identified** - Anti-trust

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			without permission and between competitors."	compliance is at the heart of CGF and GFSI and will always be paramount. All concerns in this regard will be addressed.
			"Clarification needed as we believe this means a version 2022."	●**Risk identified** - will be considered as part of detailed development of the project.
6.	Number 23	CPO	"Offering to provide resource and additional information, sign posting to the auditor competence group, the FMI foundation food safety auditing scholarship and the IAAR apprenticeship program."	●**Agree** – taking forward.
7.	Number 30	CPO	"Please consider a paper that has already been brought to GFSI's attention: Enhancing Trust in GFSI Audits Discussion Paper for GFSI Board-CPO Meeting, January 2020 (Appendix 1)."	●**Agree** – addressed during the consultation.
			"We support the development of food safety auditing as a profession. However, enforcing a business model that generates additional complexity and cost to the supply chain is not necessary."	●**Risk identified**- will be considered as part of detailed development of the project. Please note that we cannot discuss commercial aspects of our initiatives.
			"Alternatively, we propose that GFSI focuses on establishing a food safety auditor curriculum with universities and other public training institutions to reach the goal of increased confidence in competence."	●**Misunderstood** – this is the objective of programme recognition, however GFSI cannot refer to specific organisations' programmes in our requirements.
			"With the proposed timeline we are concerned about the implication for yet another re-benchmark for all the recognised CPOs against a new GFSI version, just two years after V2020."	●**Risk identified**- will be considered as part of detailed development of the project.
8.	Number 3.	CB	"This respondent identified a significant list of opportunities to improve the current situation around auditor training and ongoing CPD for consideration in initiative.	●**Risk identified**- will be considered as part of detailed development of the project.
			The main features were that current CPD programs are focussed on commercialisation and revenue generation rather than focusing on maintaining and broadening auditor knowledge.	●**Risk identified**- will be considered as part of detailed development of the project.
			Suggestion that there is a need to identify a path to develop auditors based on the risk level of the audited sector, e.g. dry food storage extended to cold food storage."	●**Agree** – taking forward.
9.	Number 7.	CB	"A constructive, risk-based approach to determine the need for ongoing assessment of auditors should be considered. The need for ongoing assessment should be based on individual auditor performance taking into account the food safety risk category, volume of audits completed, audit grading and technical competence demonstrated through the type of non-	●**Agree** – taking forward.

			conformances raised and the audit report."	
			"GFSI may provide suggestions for ongoing professional development initiatives to further the professionalism of food safety auditors; however, these should not become mandatory requirements."	●**Disagree** –we believe the BR for auditor training and CPD should become a requirement for GFSI-recognised CPOs to even the playing field, reduce the burden on auditor competence and ensure this remains a non-competitive issue. The main reason for the development of Requirements for Auditor Training is to reduce burden on auditor competence.
			"Current system is onerous and burdensome as it stands."	●**Agree**- this is the reason why we are moving to harmonise the requirements to a one trained and competent 'recognised everywhere' approach.
10.	Number 8.	CB	"There is a need of harmonization and mutual recognition of Food Safety auditors' qualification prerequisites and experiences validation between CPOs in order to reduce administrative fatigue for auditors and CBs to rebuild auditor competencies for each CPO for a same product category. GFSI framework for auditor qualification and training should provide common rules for CPOs to align their standards and prerequisites."	●**Agree** – taking forward. GFSI will create a common reference point via the benchmark against which food safety auditor training products will be commonly referred.
			"Training organization framework should be aligned with ISO19011, ISO/TS22003, ISO17021, ISO16065, IRCA rules for FSMS but also ensure stakeholders from academy, industry to actively participate."	●**Agree** – taking forward.
			"The framework should not forget to consider existing auditors and ensure recognition on the new framework to avoid additional burden to existing professionals."	●**Agree** – taking forward.
			"The timeline should also integrate implementation for CBs and auditors."	●**Risk identified**- will be considered as part of detailed development of the project.
11.	Number 12.	CB	"Consideration that all food safety auditors are trained both as a management systems auditor and a product auditor. Auditor competencies for a management system process approach are very different from a prescriptive product approach."	●**Agree** – taking forward.
			"Consideration for remote training of auditors. An online option is suggested for auditors who are already qualified for one GFSI-recognized scheme (classroom based) do not need to complete another classroom-based training for an additional scheme."	●**Agree** – taking forward.
12.	Number 16.	CB	"We would recommend that GFSI review and take into consideration the work that has been done by the Auditor Certification Scheme Committee and the SAF as a starting point, taking into consideration things that went well and challenges that arose."	●**Agree** – addressed during the consultation.

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			Comment	Response
			"We feel that there is an opportunity to create a program that could be accepted by all CPOs and provide efficiency and a more formalized approach to the process. However, transparency and input from all stakeholders will be critical to the success of such a program."	🟢**Agree** – identified benefit. 🟢**Agree** – taking forward.
			"Finally, it's important that any new program take into consideration the existing auditors and allow for inclusion based upon the competencies of those professionals and not focus solely on a training program."	🟢**Agree** – taking forward.
			"Clarification needed on how the concept will be developed and managed, e.g. who would be eligible for recognition, potential conflict of interest."	🟢**Agree** – taking forward
			"Recommendation to take current auditors into account and allow inclusion."	🟢**Agree** – taking forward.
13.	Number 24.	CB	"The key is that there is not a duplication of competency requirements, CB, CPO and GFSI, this replaced with a single process for all food safety professionals."	🟢**Agree** – taking forward.
			"Concern about additional cost, and where the role of the CB lies?"	🟠**Risk identified**- will be considered as part of detailed development of the project. Please note that we cannot discuss commercial aspects of our initiatives.
			"Importance of identifying a growth path for auditors entering the profession and not satisfying all criteria yet."	🟢**Agree** – taking forward.
14.	Number 32.	CB	"There are also some auditor training/registration organizations (e.g. CQI/IRCA) whose experience should be taken into consideration but considerably upgraded in terms of harmonisation and specified in terms of food safety competence area. The outcome of the GFSI exam initiative should be taken into consideration as well."	🟢**Agree** – taking forward.
			"The specifics of the different CPOs auditor qualification tracks should be taken into consideration and kept as this gives the opportunity for CPO to differentiate their offerings. As the auditor qualification process is a key process in the audit offering of CBs and their business management, it should be possible for CBs to join the framework as CPDs and develop their core competences for auditor qualification in compliance with the elaborated framework/ recognition programme."	🔴**Misunderstood** - the new Benchmarking Requirements will leave the opportunity to CPOs to require auditor training specific to their programmes. 🟢**Agree** – taking forward.
15.	Number 4.	Consultant	"I would encourage the new management and board of GFSI to engage in a thorough review of the results of the previous GFSI initiatives associated with food safety auditor competency and certification by	🟢**Agree** – addressed in the consultation.

			undertaking either an in-depth survey of previous participants in both the TWG on Auditor Competence and the Auditor Certification Scheme Committee as well as other involved stakeholders to identify the challenges of developing global requirements and global tools for auditor competence and certification. The mandates given to these two "committees" far exceeded the realistic expectations and the limited resources available. Thoroughly understanding what went well and what went wrong would assist the new initiative to be soundly grounded and to provide greater assurance that the expectations of both GFSI, the stakeholders and the volunteers would be met."	
			"I would strongly recommend that the initiative consider including within its scope the possibility of defining the "profession" in the context of both private sector food safety auditors (1st, 2nd and 3rd-party) and public sector inspectors/auditors. As "outcome-based" auditing increasingly becomes the common framework for both private sector and regulatory audits/inspections, a common profession with competencies, training opportunities, etc. should be a priority objective. It will also help with the recruitment and retention challenges. Canada started down this path but unfortunately there was insufficient scale in the private sector and other challenges in the public sector that limited progress. The future opportunity should not be missed."	●**Agree** – taking forward.
16.	Number 5.	AB	"Suggest GFSI only recognise providers that are accredited. They should be accredited under the programs based upon ISO/IEC 17024 (Conformity assessment – General requirements for bodies operating certification of persons) or the Conference for Food Protection (CFP) Accreditation Standard for food protection managers, to add credibility to the organizations providing this credential."	●**Agree** – taking forward.
			"Suggest that GFSI recognize apprenticeship programs and levels of auditor proficiency, recognizing that there is a learning and skill development curve for new auditors."	●**Agree** – taking forward.
			"Consider a phase-in period (several years) for the auditors to gain experience and commit to becoming credentialed and relax the requirement that only recognised auditors be employed by CBs."	●**Agree** – taking forward.
17.	Number 11.	AB	"A very much necessary change regards the auditor schedules (tours) - Business oriented auditing relates to auditors which are actively auditing 5 days a week and do their reporting on weekends. This is too much pressure for a thorough food safety audit."	●**Identified opportunity.**
			"Another issue is the direct or indirect cooperation of CBs with consultancy companies (see discussion on lists of consultants). This is decreasing the third-party characteristic and does NOT further food safety."	●**Identified opportunity.**

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18.	Number 17.	AB	"For reference see paper Private Food Safety Standards: Their Role in Food Safety Regulation and their Impact which explains the impact of an overly prescriptive approach rather than an outcome focused approach. http://www.fao.org/3/ap236e/ap236e.pdf"	●Risk identified- will be considered as part of detailed development of the project.
			"Food safety auditor apprenticeship could be similar to how the program works for Certified Public Accountant (CPA) where junior auditors might not have in-depth food safety experience but are highly skilled in analytical data analysis to better assess food safety performance data to make risk interpretations."	●Agree – taking forward.
			"Suggest that GFSI utilize providers that are accredited under programs based upon ISO/IEC 17024 (Conformity assessment – General requirements for bodies operating certification of persons) or the Conference for Food Protection (CFP) Accreditation Standard for food protection managers, to add credibility to the organizations providing the auditor credential."	●Agree – taking forward.
19.	Number 29.	AB	"The timeline should be reconsidered, otherwise in some countries will be very difficult to get auditors and so, to get certified FBOs.	●Risk identified – will be considered as part of detailed development of the project.
			Auditors exams performed by some CPOs should be eliminated whenever this feature will be implemented."	●Agree – taking forward.
20.	Number 10.	Manuf-acturer	"A key focus of GFSI and CPD needs to be both what is auditor competence and what is the criteria for an effective audit process such as in revising ISO22003 part 1 & 2."	●Agree – taking forward.
			"Programs GFSI should consider looking at: IAAR Apprenticeship Program partnership with US Dept of Labor, and prior GFSI Auditor Competence Committee work."	●Agree – taking forward, addressed during the consultation.
21.	Number 15.	SaaS Provider	"Recommend the results of training and professional development of auditors are also hosted on an IT platform to allow integration and further correlation with performance metrics for the CPOs and CBs as well as the certificate database. The technology behind the platform should enable secure sharing, with the ability for authenticity of the information to be verified, so that all users will have increased trust in both the individual's training and qualifications. Different levels of access should be available to the different stakeholders. We are happy to engage on such proposal again under the RTTT framework."	●Agree – taking forward.
22.	Number 20.	SaaS Provider	"A system in which individual auditors are centrally known, categorised and tracked would facilitate tracking of many features such as audits done, for whom, witness audits performed, reviews or accreditation audits participated in. This could also assist in the findings against the benchmarking and be used to guide the GFSI in future reviews."	●Agree – taking forward.

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23.	Number 21.	Retailer	"This is an excellent approach.	●**Agree** – taking forward.
			I recommend there be a mechanism for FBOs to provide ratings on specific auditor competency through a post audit survey and an ongoing committee (membership rotation required) to evaluate auditor competency expectations at least every three years."	●**Identified opportunity** - we believe this suggestion is best covered by a complaints procedure.
24.	Number 22.	Retailer	"An organization such as IRCA might be a good resource in setting the guidelines and framework for auditor career pathing and given their work in other industries. Additionally, they also maintain established CPD criteria for auditors which might be beneficial to review."	●**Agree** – addressed during the consultation taking forward.
			"The IFST has an established process for managing CPD including references for various types of activities which are deemed as actual CPD."	●**Agree** – addressed during the consultation -taking forward.
			"IFPTI https://ifpti.org/ have previously developed criteria for auditors and regulatory inspectors which might be useful as a point of reference various educational establishments which deliver food safety courses also include food safety auditing as part of the syllabus within their courses; however, this does not generally include any references on auditor career pathing and also fail to include mention of the challenges and demands placed on auditors. These elements must be included to ensure transparency and provide a more complete overview of the food safety auditor role."	●**Agree** – taking forward.
			"A practical process for the assessment of auditors should be developed and agreed to assess/sign off auditors, particularly with evaluation interpersonal skills. A prospective auditor needs to go through multiple audits to be signed off often for auditing the same standard but through different CBs which is valueless."	●**Agree** – taking forward.
25.	Number 28	Retailer	"Recommend implementing an apprentice type program where a new auditor would shadow a more experienced auditor for a period of time prior to auditing independently. We also recommend that this type shadowing be part of the ongoing credentialing to ensure that the auditor is still performing consistent audits."	●**Agree** – taking forward.
26.	Number 25	CB Association	"On the contrary, it is necessary to harmonize and mutually recognize auditors' qualification prerequisites and experiences among CPOs. Therefore, the GFSI framework for auditor qualification and training should provide common rules for CPOs to align standards and prerequisites."	●**Agree** – identified benefit. ●**Misunderstood** – the current benchmarking requirements already address the CPO's generic responsibilities in auditor training

				and qualification, whereas these new Benchmarking Requirements will detail further the requirements applicable to organisations delivering auditor training and CPD.
			"Be aligned with ISO19011, ISO/TS22003, ISO17021, ISO16065, IRCA rules for FSMS."	●**Agree** – taking forward.
			"Ensure that academy, industry and GFSI Board Members actively collaborate on training content."	●**Agree** – taking forward through engagement plan.
			"Increase training providers in all regions to ease access to training."	●**Agree** – identified benefit.
			"Recognize existing auditors' qualifications to prevent unnecessary burden to professionals."	●**Agree** – identified benefit.
			"Be launched in a timeline that would integrate implementation time for CBs and auditors."	●**Agree** – taking forward.
			"Finally, we consider it important to better define the term "professional framework" and how the concept would be developed according to part 2 section 4 of the GFSI benchmarking. It should also clearly state what/who will be the CPD that GFSI will recognize."	●**Agree** – taking forward.
27.	Number 19.	CB Association	"It should be considered that there are already in place some strong systems of auditor training, including those with independent, external recognition. These do not necessarily need to be modified but could be built on and used more universally."	●**Agree** – taking forward.
			"Methods of supporting the career paths of auditors are to be encouraged."	●**Agree** – identified benefit.
			"Will be happy to work with GFSI on any further work on this area."	●**Agree** – taking forward through engagement plan.
28.	Number 26.	Food Regulator	No comments.	
29.	Number 31.	Benchmark Leader	"Accredited certification of competence, according to ISO17024, could be a primary step for the recognition of the food safety auditor profession."	●**Agree** – taking forward.
			"The person certification scheme should be developed in collaboration with the CPO and other interested parties (e.g. Accreditation Bodies IAF members etc)."	●**Agree** – taking forward through engagement plan.
30.	Number 27.	Food trade association	"We recommend either the training requirements themselves and/or the competency framework emphasize critical thinking skills. Given a set of general standards, auditors must be able to apply their learnings across a variety of production situations."	●**Agree** – taking forward.
31.	Number 2.	Retailer	No comments.	

FEATURE 2

RTTT Feature 2.

Delivering a process of ongoing assessment and continuous alignment to the GFSI requirements for CPOs.

Summary of responses received to Feature 2.

4.0   Given this feature of the RTTT initiative impacts CPOs as a stakeholder group directly, we recognise that most detailed responses we received were from CPOs.

4.1   It was clear that there was a great deal of confusion amongst consultees about how the proposed new arrangements would interrelate with the existing integrity programme as set in the GFSI Benchmarking Process.

4.2   Where consultees did understand what it was that GFSI was proposing in this feature, there was broad support amongst CPOs and also by other stakeholder groups such as retailers and ABs.

4.3   Concerns were raised as to the 'aggressive' timeline we are proposing for delivery, specifically in relation to the IT platform procurement and level of harmonisation with existing CPOs systems.

4.4.   The majority of respondents were supportive of an improvement in the administration of existing GFSI integrity programmes to take account of increased frequency of interactions and level of oversight.

4.5   Non-CPO respondents were very much in favour of increased oversight of CPO integrity and ongoing delivery of alignment with GFSI requirements. A number suggested an additional mechanism for stakeholders to initiate a new procedure for complaints to GFSI where respondents had concerns and or evidence of CPO non alignment with GFSI requirements

4.6   A number of AB respondents suggested additional involvement of regulators in the integrity programmes.

4.7   There was broad acceptance of the benefits of a digital system to manage Benchmark Leaders' activity and CPO oversight over and above the existing spreadsheet management.

4.8   There were some challenges around the costs of digitising this activity and who would be expected to fund the IT costs associated with the development of this feature.

GFSI Response

4.9   We are pleased that there is commitment to initiate improvements in CPOs and also recognition that this feature will be beneficial to the current GFSI CPO oversight.

4.10   We aim to eliminate any confusion in relation to the fact that this feature of the RTTT does not replace any of the existing elements of CPO oversight and integrity programme review by GFSI and the Benchmark Leaders; it provides a digitised platform to manage that activity and to enable an increase in frequency and efficacy of GFSI/CPO oversight, and brings a focus to the current GFSI integrity programme on self-reporting and continuous improvement from CPOs.

4.11   We recognise the challenges that were raised in relation to our ambitious timelines and we are committed to delivering this initiative at pace but not at the cost of a successful outcome or one that compromises existing integrity and oversight activity.

4.12   We welcomed the additional feedback and level of concern raised by retailer consultees about the performance of CPOs. We also welcomed the suggestion of improved feedback mechanisms and complaints loops which we will commit to investigate the potential for.

4.13   We were reassured by respondents' responses indicating that upgrades to the existing oversight programmes we have in place are essential to improve our understanding of CPO performance against our requirements in a continuous way.

4.14   We are grateful for the many suggestions we received about additional elements we could consider as part of this feature of the RTTT. These included the involvement of Regulators in the oversight of CPO activity. Whilst we are grateful for the suggestion this will not be something we will be further exploring at this time preferring to advance improvements in our existing arrangements than investigate others.

4.15   We acknowledge the expression of heightened anxiety around the timelines for IT procurement and systems integration. We are committed to working in step with all impacted stakeholders to shape a system design, development and implementation that is suitable for all.

4.16   We propose to move forward with the development of Feature 2 of the RTTT in consultation with all CPOs and our GFSI Board members (or their nominated representative). We will assume participation by all 12 CPOs individually unless we are informed otherwise.

Table 2. A summary of anonymised responses to RTTT Feature 2 is set out below in Table 2 alongside a stratified response from GFSI.

No	Respondent Number	Respondent Type	Summary of Comments	GFSI Response
1.	Number 6.	CPO	"Where new SOPs are to be developed this should be in consultation with the CPOs and focus on the what and not the How."	●**Agree** – taking forward.
			"Development of the processes should include Abs, CPOs, CBs and Specifiers."	●**Agree** – taking forward.
2.	Number 14.	CPO	"Any required SOPs and KPIs shall be developed with the SAF first."	●**Misunderstood** - the mandate of the SAF does not include the Benchmarking Process, although we recognise that the stakeholders we suggest to engage on this are represented within the SAF.
			"By 'continual oversight' is a bridge too far since this comes across as 24/7 control which is not even requested of GFSI certified sites by their CBs which is even more critical when food safety is concerned. Main reason is the potential liability impact in times of a food safety crisis especially in some countries such as the USA."	●**Misunderstood** – the intention is not to monitor CPOs 24/7 but to allow for a continual oversight of CPOs using an IT platform analysing available monitoring information.
			"IT platforms need to be developed, tested and accepted which is a complex and long process in which GFSI and CPOs need to be involved. Legal constraints of data ownership and exchange need to be overcome so the January 2021 deadline is too optimistic and is suggested to be January 2022."	●**Risk identified**- will be considered as part of detailed development of the project.
			"Competence and conflict of interest requirements of involved GFSI benchmark leaders technical team members needs to be defined by SAF and shall be similar to GFSI auditor competence requirements."	●**Identified opportunity**- a good idea not related to the RTTT feature but one that GFSI will consider moving forward.
1.	Number 18.	CPO	"GFSI should only focus on only those GFSI requirements, which go beyond ISO/EA/IAF requirements."	●**Identified opportunity**- a good idea not related to the RTTT feature but one that GFSI will consider moving forward.
			"We find that significant variability exists between GFSI technical reviewers and there is insufficient internal calibration. There is a need for a much stronger calibration of GFSI technical reviewers in order to improve oversight."	●**Identified opportunity**-a good idea not related to the RTTT feature but one that GFSI will consider moving forward.
			"We believe that GFSI itself needs to be reviewed by a trusted third party."	●**Identified opportunity**- a good idea not related to the RTTT feature but one that GFSI will consider moving forward.
2.	Number 23	CPO	"Additional attention should be directed toward controlling new addendum and off-shoot standards. Control and additional rigor in the CPO application process should be put in place to determine the	●**Agree** – taking forward.

			CPO applicants' commitment to food safety, and their capability and support to sustain their certification program. New applicants should be able to demonstrate their support for developing regions, in which GFSI would desire to expand."	
3.	Number 30	CPO	"In order to ensure quality, consistency, transparency, and efficiency it is important that the reviews of the CPOs as described in this feature be conducted by persons that comply with at least the same competencies and requirements as CB auditors."	●**Identified opportunity**- a good idea not related to the RTTT feature but one that GFSI will consider moving forward.
6.	Number 9.	CPO	"The timeline of having requirements in place by January 2021 seems aggressive, given that it will take some time and consultation with CPOs to agree on the KPIs, etc. upon which self-reporting will be based. Clarification is needed as to the role of Benchmark Leaders. The proposal seems to state they would no longer be part of the spot check/random sampling process. Is it also implied that the Benchmark Leader would no longer be part of the on-site annual review? If GFSI staff is qualified and can carry out these activities without the Benchmark Leader, that could potentially reduce costs for CPOs in North America (where there are no BLs); that would be a welcome development."	●**Risk identified**- will be considered as part of detailed development of the project. ●**Misunderstood** – the Benchmark Leaders will continue to carry out the assessments of CPOs.
7.	Number 13.	CPO	"Although we see benefits in costs associated with benchmark and GFSI technical team not travelling around the world for office assessments, there is no real perceived benefit here. GFSI do have the required oversight, ask for something and you generally get an appropriate response, as long as it is within the bounds of the contractual arrangement. There are already appropriate steps and processes in place between IAF/ AB's/ CB's and the CPO's, what is it here that is not working for GFSI? This clearly needs to be documented and determined before significant cost and time is spent in developing an IT solution. This seems a rather firm approach on the outset that undermines the relationship building and collaborative approach that GFSI has undertaken previously. 4.2 - What is it that CPOs would be reporting in this space? We do not own the certificates that are issued, this is firmly the space of the certifier, the CB. If they chose to provide certification to site, then that is their choice under the accreditation framework, and they do not consult us CPOs in making this decision – that's why it is independent third party. We provide the standard and the rules	●**Misunderstood** – the Benchmark Leaders will continue to carry out the assessments of CPOs. ●**Risk identified**- will be considered as part of detailed development of the project. ●**Misunderstood** – the comments seem to relate to certification data and RTTT3, RTTT2 relates to CPO benchmarking assessment information .

aligned to the ISO standards(s) and GFSI framework for this to occur.

4.3 Why as a CPO should we be held entirely responsible for the root cause and continuous improvement of these bodies (CBs)? If this is the intent - as the wording under 4.1 is ambiguous. If we find issues they are addressed on a case by case basis, in consultation with those they are accredited against, again the AB could decide to suspend the CB and we as a CPO would have no say in it, particularly if it is not an issue related to our program requirements.

●Misunderstood – the CPO is responsible for continuous improvement of their own system and the performance of their Certification Programme. This may include working with ABs and CBs.

There are again privacy issues here in relation to a certified sites information being made to a wider set of unknown persons and stakeholders. How is this expected to be addressed by GFSI, considering differing privacy laws globally?

●Risk identified- will be considered as part of detailed development of the project.

How is this going to be funded? Who is paying for it - CPO, ABs, CB, certified sites?"

●Risk identified- will be considered as part of detailed development of the project.

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8.	Number 8.	CB	"GFSI should also considers regulators inputs on such ongoing assessment to ensure impartiality."	●Identified opportunity- a good idea not related to the RTTT feature but one that GFSI will consider moving forward.
9.	Number 16.	CB	"GFSI benchmarking should also consider regulators' inputs on such ongoing assessment to ensure impartiality."	●Identified opportunity- a good idea not related to the RTTT feature but one that GFSI will consider moving forward.
10.	Number 25	CB Association	"GFSI should also considers regulators' input on ongoing assessments to ensure impartiality."	●Identified opportunity- a good idea not related to the RTTT feature but one that GFSI will consider moving forward.
11.	Number 19.	CB Association	"This area is of less direct concern and direct interest to us. However, it is important that the ongoing tracking of CPOs' performance and adherence to GFSI benchmarking requirements does not result in increased reporting and bureaucracy for CBs."	●Risk identified- will be considered as part of detailed development of the project.
12.	Number 10.	Manufacturer	"GFSI logo should be on each GFSI-recognised CPO certificate (but not technically equivalent gov schemes)."	●Identified opportunity- a good idea not related to the RTTT feature but one that GFSI will consider moving forward.
			"GFSI should have ongoing data driven compliance verification of CPOs and in turn be a valuable resource to stakeholders on permitted information sharing."	●Agree – taking forward.
			"GFSI input to the current revision of ISO22003 part 1 & 2 should help GFSI achieve its goals and bring process transparency and accountability in a	●Agree – taking forward.

			harmonised approach at an ISO level for GFSI, IAF, and regulators…and help achieve 'once certified, accepted everywhere'."	
13.	Number 11.	AB	"The GFSI benchmarking should relate very much to the technical standards safeguarding food safety. We want to point out that according to ISO/IEC 17011, 4.6.3 - ABs have to check on the validity of schemes in their own responsibility. Plus, EA owns a very robust procedure on evaluating schemes (EA 1/22). A very much cooperative stance is necessary, including the IAF, IAF-regions like ARAC, EA, APAC etc.)."	●**Agree** – taking forward.
14.	Number 17.	AB	"The current fixed approach for CPO integrity programs does not consider performance or risk. For example, if a CB demonstrates good performance, they should be assessed less, if a CB demonstrates poor performance, they should be assessed more."	●**Agree** – taking forward.
15.	Number 5.	AB	"Caution GFSI against increasing oversight of the CPO that may not add value. We are not confident that random sampling of audits and more frequent reviews of all CPOs adds value. If the CPO requirements or the Benchmark requirements do not change, then extra oversight may not be a useful endeavour."	●**Risk identified**- will be considered as part of detailed development of the project.
16.	Number 15.	SaaS Provider	"We suggest that the expectation and agreement to integrate with the IT platform form part of the contract between GFSI and each CPO, CB and potentially training and CPD provider."	●**Identified opportunity**- a good idea not related to the RTTT feature but one that GFSI will consider moving forward.
			"The platform should host on the one hand the hard data reporting requirements, like certificate data (Feature 4), qualification of auditors (Feature 1) etc., and on the other hand collect data regarding the soft reporting requirements outlined in the Requirements for the Management of Certification Programmes that need to be verified as part of the GFSI Integrity Programme (Features 2 & 3)."	●**Identified opportunity**- a good idea not related to the RTTT feature but one that GFSI will consider moving forward.
			"We suggest that the technology provider is closely involved in the conversations between the different stakeholders on the type of information that needs to be captured, needs for analytics, access levels and associated permissions and the integration via the open API."	●**Agree** – taking forward.
17.	Number 20.	SaaS Provider	"For this to be effective it would be of great benefit if there is engagement from both parties in terms of the sharing of relevant data and findings."	●**Agree** – taking forward.
			"Having an independent third-party legal entity involved can potentially help. It can also be very useful to have discernible KPIs for CPOs that are practicable to attain and agreed by all parties as realistic and beneficial to all parties."	●**Agree** – taking forward.

18.	Number 22.	Retailer	"Ongoing monitoring of CPOs performance would be beneficial and should include a process for stakeholders to provide direct feedback to GFSI where issues have been identified at GFSI certified sites."	●**Agree** – taking forward.
			"Potential non-disclosure agreements a customer may have with their GFSI certified supplier should be considered when developing a process for providing feedback. Maintaining a level of anonymity might improve the quality and clarity of the information provided."	●**Agree** – taking forward.
19.	Number 28	Retailer	"Recommend better established protocol to report inconsistencies in audits, CPOs. Consistent routes to reporting problems or inconsistencies."	●**Agree** – taking forward.
			"Recommend GFSI have their own internal audit programme with auditors who would do unannounced audits with the applicable CPO."	●**Identified opportunity**- a good idea not related to the RTTT feature but one that GFSI will consider moving forward.
20.	Number 31.	Benchmark Leader	"GFSI should define more detailed requirements regarding the CPO Integrity Programme in terms of minimum KPIs, frequency, modalities, etc."	●**Agree** – taking forward.
			"The GFSI ongoing assessment could be more focussed on the effectiveness of the CPO Integrity Programme, including a documental review of the activities carried out by the CPO."	●**Agree** – taking forward.
			"GFSI could increase his active role in case of a specific lack of confidence in the certification and have the possibility to participate at the IP on-site, in collaboration with the CPO (e.g., post-audit, witnesses, etc.)."	●**Agree** – taking forward.
21.	Number 4.	Consultant	"The current work on the revision of ISO 22003-1 and the development of ISO 22003-2 presents a very real opportunity to facilitate the process and alignment between the two approaches to accredited certification of food safety management systems and/or food safety systems. Having common or equivalent elements between the requirements for FSMS certification and FSS/product/process certification would substantially improve the transparency of accredited certifications, facilitate stakeholder (particularly regulator) understanding, and further the likelihood of certifications to benchmarked schemes being recognized."	●**Misunderstood**- these comments relate to the promotion of a particular point of view and are not related to feature 2 of the Consultation.
22.	Number 26.	Food Regulator	No comments.	
23.	Number 2.	Retailer	No comments.	

FEATURE 3

RTTT Feature 3.

Developing a collaborative approach to the management of Certification Bodies between CPOs, Accreditation Bodies and GFSI.

Summary of responses received to Feature 3.

5.0   The majority of respondents were in favour of the development of this feature of the RTTT citing multi stakeholder engagement and data sharing as a powerful tool in the advancement of food safety outcomes.

5.1   A number of stakeholders raised cautions around data exchange and availability and liability issues arising from any detrimental impact on CBs. Issues were also raised around anti-trust regulation.

5.3   These concerns arise from some confusion in relation to the role that GFSI was proposing to play specifically in relation to this feature and whether GFSI was planning to position itself as the arbiter of CB performance over and above the ABs and CPOs. To clarify, this will never happen nor will any sensitive information be exchanged outside of the official collaborators which is not intended to include GFSI.

5.4   The majority of respondents warmly welcomed the opportunity to bring all elements of the CB monitoring ecosystem together to work more collaboratively and with impact.

5.5   There were strong recommendations to GFSI to use the International Accreditation Forum to coordinate this work leaning on their ability to apply strong governance, utilise existing groups and associated expertise.

5.6   GFSI was commended for its approach to improving food safety outcomes through this proposed feature by a retailer consultee, who recognised the unique role that GFSI can play in facilitating effective dialogue between multiple actors in the food safety ecosystem.

5.7   There was broad recognition by multiple respondents that working together effectively and sharing oversight data relating to CB performance issues was beneficial not just to the CPOs and the ABs but to the CBs themselves who are exposed to multiple assessment activities when working with multiple CPOs from which they currently derive no earned recognition.

GFSI Response

5.8   GFSI is grateful to all of those who responded and offered their ideas and expertise to help us to shape this feature of the RTTT.

5.9   GFSI is an initiative of the Consumer Goods Forum an organisation which represents the world's largest food, drink and consumer products brands and retailers. Ensuring that we address any perceived antitrust issues is at the heart of everything that we do. As such, we are governed by strict anti-trust statutes and before undertaking any initiatives we ensure that we are fully engaged in all necessary compliance measures. Throughout the design, development and implementation of all our work, we are obligated to ensure that we continue to operate compliantly.

5.10   GFSI intends simply to enable and facilitate the CPOs and ABs to work collaboratively together to share information which they feel can contribute to a better understanding of CB performance. It was not our intention to assume a role directly in the oversight of CB performance or derive access to this data.

5.11   GFSI warmly accepts all recommendations of the role that the IAF could usefully play in the design, development and implementation of this feature of the RTTT. We have for many years been close stakeholders and an active and vibrant participant in the IAF food group. It is hugely reassuring to hear across our consultee community that they welcome the opportunity for the IAF to play a leading role in taking this work forward.

5.12   We propose to take Feature 3 of the RTTT forward and intend to enable the design, development and implementation of this work by working collaboratively with the members of the IAF food working group on which ABs, CBs, CPOs and businesses are all well represented.

Table 3. A summary of anonymised responses to RTTT Feature 3 is set out below in Table 3 alongside a stratified response from GFSI.

No	Respondent Number	Respondent Type	Summary of Comments	GFSI Response
1.	Number 6.	CPO	"The legality of this process with respect to anti-trust issues will need to be checked."	●Agree - antitrust compliance is built in to all GFSI work and specific concerns raised will be addressed expressly.
			"GFSI will need to recognise the liability implications should a recommendation be taken to suspend a certification body."	●Misunderstood – appointment and suspension of CBs will remain the CPOs' responsibility and choice (no recommendation will come from the proposed feature).
			"There will need to be an established complaint and appeals process with independent adjudication developed for Certification Bodies."	●Agree – taking forward.
			"CPOs must be allowed to appoint and suspend	●Misunderstood – appointment

			certification bodies independently of the collective GFSI position recognising that some performance metrics over and above the generic GFSI KPIs may be of importance to some Stakeholders of a scheme."	and suspension of CBs will remain the CPOs' responsibility and choice.
2.	Number 9.	CPO	"The proposal (item 5.5.) to include CB representatives on a potential task force under element 3 should be reconsidered. There would be anti-competitive, anti-trust implications for certain CB (or CB reps) to have access to privileged information about their competitors or about auditors who may be contracted with one or more CBs. Having CB reps involved could also adversely impact the forthrightness and transparency of CPOs who have problems to report."	●**Risk identified**- will be considered as part of detailed development of the project. No such access to sensitive or other information will be provided.
4.	Number 14.	CPO	"The IAF Working Group Food will be able to assist with this just like they did in the development of suggested solutions to GFSI in support of the RTTT challenge plus the remote audit guidance paper. In doing so, distinction might have to be made between CBs accredited against ISO 17065 vs ISO 17021 combined with ISO/TS 22003."	●**Agree** – taking forward.
			"A harmonized set of KPIs that measure CB performance can subsequently be included in the GFSI requirements for the CPO Integrity Program so that CB performance is measured in a harmonized manner."	●**Agree** – taking forward.
			"The extent to which this data is accessible and/or can be exchanged between parties is dependent on legal provisions (anti-trust, GDPR, etc.), business confidentiality & liability and stakeholder authorizations. For these reasons, the suggested deadline of January 2021 is too optimistic but is suggested to be September 2021."	●**Risk identified**- will be considered as part of detailed development of the project. Since antitrust and other legal compliance is built into our processes already, we are confident we can attain the January 2021 deadline and see no reason to delay matters further; indeed, to do so would jeopardise the consultation's clear aim of improving quality and trust.
5.	Number 18.	CPO	"GFSI may establish a set of KPIs that is measured and displayed the same way by each CPO. This GFSI KPI shall be a subset of the CPOs own KPI, i.e. the CPO may measure more issues in addition to the GFSI KPI, but may display both and share this with the ABs. With aligned KPIs, GFSI will have a passive role during the performance check of CPOs."	●**Agree** – taking forward.
			"The power of the accreditation process should be strengthened and not compromised. CB monitoring is mainly done by the ABs. That is why we are requiring ISO17021 and ISO 17065 accreditation. Once we pay for this service, we need to utilize the data collected by the AB.	●**Agree** –Identified benefit.

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			"It would be helpful to foster more harmonization among ABs. In order to make the accreditation process more effective and the results comparable, the priorities should be to establish harmonised evaluation criteria and better training for the AB assessors."	●Agree –Identified benefit.
			"This is the job of SAF and should not be duplicated. It should be a part of the benchmarking requirements, unless GFSI is setting up their own integrity program which replaces the CPOs' integrity programs. In this case, GFSI would have to bear complete liability for the integrity program."	●Misunderstood – GFSI is not looking to assume responsibility for either CPOs integrity programmes or CB performance, only to provide a collaboration tool for CB, ABs and CPOs.
6.	Number 23	CPO	"GFSI, ABs, CBs and the CPOs need to work collaboratively to identify areas of oversight. The AB brings a value and trust to the certification process and should be allowed to continue. Too much work is being repeated by the CPO that takes resources away from other areas of oversight and compliance that would be much more valuable. All parties need to work together to establish and agree on specific areas of oversight and management so that the needs are identified, monitored, and controlled. We would be happy to participate in this collaboration."	●Agree –Identified benefit.
7.	Number 30	CPO	"GFSI may establish a set of KPIs that is measured and displayed in the same way by each CPO. This GFSI KPI shall be a subset of the CPOs own KPIs, i.e. the CPO may measure more issues in addition to the GFSI KPIs but may display both and share this with the ABs. With aligned KPIs, GFSI will strengthen the role of the ABs without assuming that role."	●Agree –Identified benefit.
			"The power of the accreditation process should be strengthened and not compromised. CB monitoring is mainly done by the ABs and CPOs integrity programs are complementary to that. There is no need for GFSI to impose a third layer of oversight and to assume liability."	●Misunderstood – GFSI is not looking to assume responsibility for either CPOs integrity programmes or CB performance, only to provide a collaboration tool for CB, ABs and CPOs.
			"It would be more logical to foster improved harmonization among ABs. In order to make the accreditation process more effective and the results comparable, the priorities should be to establish harmonized evaluation criteria and better training for the AB assessors."	●Identified opportunity- a good idea not related to the RTTT feature but one that GFSI will consider moving forward.
8.	Number 3.	CB	"Accreditation Bodies act with different criteria and guidelines. With the difference in criteria there is continual need of CB's to update programs and procedures with nonvalue added requests. We encourage a higher involvement in this concern from the International Accreditation Forum (IAF)."	●Agree – taking forward.
			"A standardization in evaluation criteria will allow CB's to focus on key requirements and increase	●Agree –Identified benefit.

			efficiencies."	
			"There is an overlap of responsibilities between CPOs and ABs without a coordinated effort and if the expectation is that GFSI adds new overseen responsibilities then a larger overlap may result which finally reflects in bureaucratic programs and higher costs passed to the certified organizations."	●**Misunderstood** – GFSI is not looking to assume responsibility for either CPOs integrity programmes or CB performance, only to provide a collaboration tool for CB, ABs and CPOs.
9.	Number 7.	CB	"If this task force does go ahead then it is critical that CB representation is present as a relevant actor."	●**Agree** – taking forward.
10.	Number 8.	CB	No comments.	
11.	Number 12.	CB	"The objective would be to not repeat and duplicate the same requirements. CPO integrity program requirements should focus on specific interpretation of their scheme."	●**Agree** – taking forward.
12.	Number 16.	CB	No comments.	
13.	Number 24.	CB	"A co-ordinated approach would be a help to reduce multiple audits undertaken by CBs."	●**Agree** –Identified benefit.
			"CBs shall have insight into these KPIs and must be part of the working group on this. KPIs shall be harmonised among the schemes and KPIs shall be defined for serving the purpose (e.g. number of NC during an audit is not a good indicator and could lead to inefficient audits in itself). By definition should this not already be the intent of the 'accreditation' process; as we know perceived inadequacies of the accreditation audit process over the years has led to the need for CPOs to enact their own KPIs and measures of CB performance and compliance – therefore consideration needs to be given to how all stakeholders needs can be captured through a single set of measures and verification process."	●**Agree** – taking forward.
			"Consideration needs be given to competencies of personnel with responsibility for monitoring and assessing conformance."	●**Identified opportunity-** a good idea not related to the RTTT feature but one that GFSI will consider moving forward.
14.	Number 32.	CB	No comments.	
15.	Number 4.	Consultant	No comments.	
16.	Number 5.	AB	"If GFSI plans to implement a facilitated data exchange, then it must gather the data anonymously and without repercussions if inconsistencies are reported. GFSI should revisit the reasons for gathering the data and be transparent with the outcome of that data gathering, before moving forward with this	●**Risk identified-** will be considered as part of detailed development of the project.

			Feature."	
17.	Number 11.	AB	"This will require approaching the IAF regions and single AB on higher level and a proposal for MoUs and agreements considering the legal baseline, data protection issues. Individual parties need to consent (CPO, GFSI, AB, FBO….)."	●Risk identified- will be considered as part of detailed development of the project.
			"We propose, GFSI involves itself more into ISO/CASCO circles."	●Agree – taking forward.
18.	Number 17.	AB	"Oversight of the CBs should include review of the "GFSI Guideline for Witness Audit Assessment (Edition 1, December 2016)" document. It is understood GFSI have since changed their mind and decided to no longer issue guidelines and / or guidance. In this example if GFSI prefers not to re-issue the "GFSI Guideline for Witness Audit Assessment" guidance, GFSI could make a request to IAF to produce such a document. Guidance for Witness Audits could be published under IAF Informative Documents (ID Series) these documents are for information purposes only to support a consistent application of requirements."	●Agree – taking forward.
			"Suggested common performance indicators – please refer to 4.1 recommended measures for CPOs which could also be applied for CBs and ABs."	●Agree – taking forward.
			"GFSI proposes a multi-stakeholder taskforce Response: IAF Food WG TF would welcome the opportunity to participate in the multi-stakeholder taskforce."	●Agree – taking forward through engagement plan.
19.	Number 29.	AB	"Some thinking about cross-frontier accreditation may be also taken into account, the level of surveillance performed by ABs when a CBs certificates in many different countries is lower than when the CBs only certificate in one country."	●Agree – taking forward.
20.	Number 10.	Manufacturer	"Use ISO standards where possible to give IAF, ABs, CBs GFSI, regulators a common language. This will help data normalization as well to digitize and measure compliance and performance."	●Agree – taking forward.
			"GFSI should consider how ISO22003 can provide an aligned framework for among ABs, CBs and GFSI."	●Agree – taking forward.
21.	Number 15.	SaaS Provider	No comments.	
22.	Number 20.	SaaS Provider	No comments.	
23.	Number 21.	Retailer	"I would like to see auditors rated as to their competency in general, their knowledge of the multiple standards- or at the very least the four major standards, their industry knowledge (i.e. a raw meat auditor would have different skills than a RTE food auditor.)"	●Identified opportunity- a good idea not related to the RTTT feature but one that GFSI will consider moving forward.
24.	Number 22.	Retailer	"Establishing common performance indicators would be beneficial and provide greater	●Agree –Identified benefit.

			transparency for everyone. Enabling public data sharing of CB performance could also influence selection of the CB by the FBO seeking certification."	
25.	Number 28.	Retailer	"We recommend scoring within audit reports be more consistent from CPO to CPO and CB to CB."	●**Identified opportunity**- a good idea not related to the RTTT feature but one that GFSI will consider moving forward.
26.	Number 25.	CB Association	"To this end, we recommend developing: 1. a common monitoring and assessment (ISO17021 vs ISO17065), which would be performed once by a single assessor and whose results will be accepted by all."	●**Agree** – taking forward.
			"2. a collaborative platform for CBs performance monitoring to be fed by ABs and CPOs."	●**Agree** – taking forward.
			"3. CPOs' further collaboration to leverage CBs assessment and performance results between each other on common requirements to limit assessment fatigue for CBs."	●**Agree** – taking forward.
			"Finally, we would be interested in participating in the proposed multi-stakeholder taskforce."	●**Agree** – taking forward through engagement plan.
27.	Number 19.	CB Association	"It would also be good to ensure performance measures are in place across all points of delivery in the GFSI system to ensure its efficiency, effectiveness and robustness."	●**Identified opportunity**- a good idea not related to the RTTT feature but one that GFSI will consider moving forward.
			"Having CBs are the heart of the development of this element is vital; IIOC would be happy to be part of this."	●**Agree** – taking forward through engagement plan.
28.	Number 26.	Food Regulator	No comments.	
29.	Number 31.	Benchmark Leader	No comments.	
30.	Number 27.	Food trade association	No comments.	
31.	Number 2.	Retailer	"We believe that GFSI can and should foster the systematic, objective and transparent investigation the cause of food safety incidents, as mentioned above, through the close collaboration with CPOs, CBs and ABs, and disclose information and lessons learnt."	●**Agree** – taking forward.

FEATURE 4

RTTT Feature 4.

Developing a certificate platform - enabling access to certificate data of all FBOs certified to a GFSI-recognised Programme.

Summary of responses received to Feature 4.

6.0   The majority of respondents raised issues relating to data protection requirements and data ownership.

6.1   A number of negative responses were received in relation to this feature which largely claimed that it was a duplication of effort in that the IAF and GFSI-recognised CPOs have databases already in place and therefore this activity was not a welcome or necessary step to take.

6.2   Concerns were raised again about timelines for the development of the database and how challenging they could be to ensure a smooth transition of data and implementation.

6.3   There was a significant level of misunderstanding about what data we would actually be requesting and a lot of effort was spent providing feedback on activities we are not intending to implement. This related specifically to the collection of audit reports.

6.4.   Concerns were raised about the legality of this feature specifically as it related to anti-trust issues. This challenge largely related to access rights and what information would be shared by GFSI and what would be made public.

6.5.   A number of respondents raised concerns about the cost of the development and implementation of the system and how it would be funded. The question of what return on investment would it deliver was also mentioned by at least two respondents.

6.7   The challenges of harmonising the proposed IT platform with existing CPO databases was raised by the majority of respondents who were CPOs.

6.8   The majority of respondents who were not CPOs were very supportive of this idea and recognised the value that a centralised data base of certified sites would bring to buyers, regulators and GFSI. The link between transparency of certified sites and trust and confidence in the certification system was raised multiple times.

6.9   A number of respondents raised the value of expanding this feature to include users of the Global Markets Programme.

6.10   The respondents who were retailers were very supportive of this feature raising numerous concerns about the limited functionality and accessibility of existing CPO databases and challenging the accuracy of the data.

6.11   The one regulatory respondent confirmed the value of the data to Regulators and indicated a desire that this feature be aligned with Codex guidelines on vTPA data sharing.

6.12   AB respondents recognised the value of the database and challenged GFSI not to reinvent the wheel indicating a close working alignment with IAF.

GFSI Response

6.13   GFSI is grateful to all respondents for the very detailed and considered responses provided by all consultees.

6.14   GFSI recognises that despite our best endeavours, this feature of the RTTT as reported at a high level in the consultation led consultees to be confused about our desire to collect data that we have no intention of requesting access to.

6.15   GFSI believes that this system will significantly simplify the existing processes and procedures it has in place already to obtain certificate data returns from CPOs linked to the number of certified organisations   .

6.16   We have noted the number of issues raised by respondents about the value to businesses of a central database where all certified organisations were listed. It is also noted that respondents recognised the relationship between data transparency and trust in the certification system.

6.17   GFSI welcomes the opportunity to collaborate and share learning with many stakeholders and the IAF is no exception. We are aware of the existing Certsearch database and as such have noted that it currently only hosts certificate issued by Certification Bodies accredited against ISO 17021 and not to ISO17065. We welcome the opportunity to further explore whether a collaborative approach is an option to deliver our outcomes related to this feature.

6.18   As previously noted anti-trust issues are at the heart of everything that we do. As such we are governed by strict anti-trust statutes and before undertaking any initiatives ensure that we are fully engaged in all necessary compliance measures. Throughout the design, development and implementation of all our work we are obligated to ensure that we continue to operate compliantly.

6.19   We welcome the suggestion that Global Markets Programme data should be included in the terms of reference of this feature of the RTTT. Although this is not in scope for this

feature, we are committed to exploring what that could look like, whilst cautioning against the fact that GFSI does not recognise any certification issued in the name of the Global Markets Programme.

6.20   We welcome the feedback provided by the Regulatory consultee and note the strong connection between this proposed feature of the RTTT and the data sharing work we have been undertaking with the global Regulatory community and OECD.

6.21   We fully appreciate the reason why our CPO consultees are largely not in favour of this feature believing it to be some attempt to obtain and share their confidential data. This is absolutely not the case, nor is it the intention of GFSI to become a CPO ourselves. We are content however, that most of these reservations are based on a misunderstanding of what it that we are intending to do and can be swiftly overcome during the process of designing and developing this feature collaboratively with the CPOs.

6.22   We are committed to ensuring that we continually improve our IT infrastructure to ensure ease of use, compatibility with existing systems and safety of data exchange and we strongly believe that this feature will address many of the challenges CPOs face in providing GFSI with accurate certification data for the purposes of invoicing. We have noted the time and inconvenience our current systems pose and are committed to improving them.

6.23   GFSI proposes to move ahead with the development of this feature by first exhausting all opportunities to align with the existing IAF Certsearch. In the event that this is not possible we will convene a small group of affected stakeholders to select a GFSI-specific solution.

Table 4. A summary of anonymised responses to RTTT Feature 4 is set out below in Table 4 alongside a stratified response from GFSI.

No	Respondent Number	Respondent Type	Summary of Comments	GFSI Response
1.	Number 6.	CPO	"It will be necessary to determine the rights and ownership of data supplied to the GFSI platform and that all necessary contractual relationships establish the necessary rights for transfer of that data between all involved parties."	●Risk identified- will be considered as part of detailed development of the project.
			"CPOs and their IT departments need to be involved in this project to ensure compatibility of content and methods of information sharing with existing CPO databases, as well as ensuring data security standards are appropriate to the content to be handled."	●Agree – taking forward through engagement plan.
2.	Number 9.	CPO	"The timeline of January 2021 seems very aggressive. Scoping of IT projects is notoriously difficult, and the potential for unanticipated issues arising is generally underestimated. This project will require interfacing with numerous CPOs' databases; therefore, CPOs will need adequate lead time to ensure all of our systems can	●Risk identified- will be considered as part of detailed development of the project.

efficiently feed data into a central repository managed by GFSI.

Undoubtedly, this initiative would improve transparency and access to information for regulators and buyers. However, since this initiative does not improve food safety, the services involved should not be financed by revenue from CPOs (e.g. certificate fees).

Within the consultation document, we do not believe that item 6.0 accurately reflects the status quo. Information about certified companies is publicly and readily available through all CPOs and all CBs. GFSI is provided the information by CPOs as to "how many [certificates] there are at any given time, and where in the world they are". We report to GFSI at the frequency that GFSI has requested (quarterly, annually). In item 6.5, it is noted that the current reporting system is resource intensive. Without qualification, we can assure you that the proposed alternative will be significantly more resource-intensive and costly for CPOs, especially small organisations like ours who do not have the sophisticated IT systems (and revenue base) of much larger CPOs.

Consideration should also be given by GFSI to the potential liability associated with presenting data that will never be accurate in "real-time". Only the CB registries contain "real-time" data about an FBO's certification status."

4.	Number 14.	CPO	"And it is not needed to develop a new platform since there is already one which is the IAF Cert Search (www.iafcertsearch.org) project which has started to collect certificate data for all accredited certifications globally. This project aligns best to the GFSI needs since it is already up and running and will strengthen the GFSI relationship with IAF. It does have credible IT partner behind it which is important to protect GFSI reputation."	●**Risk identified**- will be considered as part of detailed development of the project.
5.	Number 18.	CPO	"At first, we are very sceptical as to the new general passage obliging CPOs to provide GFSI, upon request, with all data on audits, auditors and certification bodies for which the CPO is responsible."	●**Misunderstood** – the GFSI proposal only includes certificate data. No other data is requested.
			"We have questioned how this general requirement should contribute to achieving GFSI's goal of more harmonisation and better food safety. In our view, the mere collection of data would not contribute to this. We therefore see no objective justification for this demand. However, this is demandable due to the market position of GFSI."	●**Misunderstood**- the objective of this initiative is to facilitate data analysis and "live" validation of certificate status across GFSI-recognised programmes.
			"Currently CPOs provide a regular update every 3 months which can be queried by GFSI for correctness, and statistics can be drawn from it. It	●**Misunderstood** – this initiative would make the manual report unnecessary, the data reporting

is very difficult to see the added value for establishing such real-time data availability and the cost for it."	more accurate, and not restricted to a quarterly frequency.
"This data transparency is already available today at CPO level. Transparency in GFSI certification data can be achieved in multiple ways and does not justify the data being held centrally by GFSI with all the associated privacy rules and legal liability, with respect to accuracy."	●**Risk identified**- will be considered as part of detailed development of the project.
"We ask what problem does this solve? If the problem is the need to have the opportunity to check across CPOs to see whether a GFSI certificate is in place or not, it is sufficient to have a lookup service forwarding to the CPOs in order to access the concrete data set rather than duplicate information and services. There is no added value bringing the GFSI certificate data from different CPOs together and duplicating liability and cost. We find this will generate unnecessary cost and effort to replicate what CPOs already have in place."	●**Risk identified**- will be considered as part of detailed development of the project.
"Additionally, data harmonisation effort links into the CPO business decisions and therefore poses the risk of an anti-trust issue. Forwarding information to a central repository with different levels of access and redistributing it conflicts with existing rules and regulations regarding data access. We fail to see the difference in terms of data access for GFSI board member companies. So, at first CPOs have to respect the needs of their stakeholders and to guarantee data protection issues of their stakeholders, which includes audit data, etc."	●**Risk identified**- will be considered as part of detailed development of the project.
"Please refer to our response to 6.1. The transparency itself is not missing, but the access to it could be facilitated across CPOs. This does not justify the duplication, the cost, and the efforts to replicate data and functionality."	●**Risk identified**- will be considered as part of detailed development of the project.
"Please refer to our response to 6.1. This is purely duplication as these services already exist and do not bring any added value except for the ease of access, which does not need to go beyond a lookup/forwarding mechanism. This also conflicts with the competitiveness of CPO market solutions. We do not believe that national regulators benefit from this harmonisation. We do not see a current problem which cannot be solved today with the existing CPO solutions. If issues do arise, CPOs have much stronger relationships to most local authorities than GFSI does."	●**Risk identified**- will be considered as part of detailed development of the project.
"This requirement is in fact simply expanded, which means reporting all the information constantly. We don´t see any value.	●**Risk identified**- will be considered as part of detailed development of the project.

			This does not deliver any added value compared to the situation today. There is no clear information on the technicality of how this is to be done, which means CPOs do not have enough time to prepare. Who should cover this investment, including the costs for CPOs to adopt these measures?"	
6.	Number 23	CPO	"Don't reinvent the wheel. There are many database platforms that are available to accomplish this goal. New databases are costly and time consuming to manage. The scope should be limited to providing a means to display certificates."	●**Risk identified**- will be considered as part of detailed development of the project.
7.	Number 30	CPO	"It is not clear what problem a centralized database will solve. In fact, a centralized database raises many problems and concerns."	●**Risk identified**- will be considered as part of detailed development of the project.
			"Currently CPOs provide a quarterly update which can be queried by GFSI for correctness, and statistics can be drawn from it. It is very difficult to see the added value for establishing such real-time data availability, especially considering the cost implication."	●**Risk identified**- will be considered as part of detailed development of the project.
			"The required data transparency is already available at CPO level. Transparency in GFSI certification data can be achieved in multiple ways and does not justify the data being held centrally by GFSI with all the associated privacy rules and legal liability with respect to accuracy."	●**Risk identified**- will be considered as part of detailed development of the project.
			"Data harmonization efforts link into the CPO business decisions and therefore pose the risk of an anti-trust issue. Forwarding information to a central repository with different levels of access and redistribution conflict with existing rules and regulations regarding data access."	●**Risk identified**- will be considered as part of detailed development of the project.
			"CPOs have to serve in the first place all stakeholders for whom the schemes have been designed. CPOs have to respect the needs of their stakeholders and to guarantee data protection issues of their stakeholders, which includes audit data. Each CPO's database is the single point of truth and we therefore don't support use of a different database to authenticate certification status."	●**Risk identified**- will be considered as part of detailed development of the project.
			"We do not believe that national regulators benefit from this harmonization. We do not see a current problem which cannot be solved by the existing CPO solutions. If issues do arise, CPOs have strong enough relationships with most local authorities to deal directly."	●**Risk identified**- will be considered as part of detailed development of the project.
			"The proposed timeline seems to be short for implementing this. There is no clear information on the technicality of how this will be done, the cost implications and who will bear the cost of	●**Risk identified**- will be considered as part of detailed development of the project.

			implementation."	
8.	Number 3.	CB	"Common data platforms seem a logical path which is accepted and appreciated however the following situations must be considered. - Differences in CPO programs may reduce the type of information gathered and dilute the benefits that could be achieved. - Most of the CPOs provides public access to their list of certified customers and feedback when an organization is suspended. If this principle is applied to all CPOs then a new database may be a duplication. - Data integrity is a concern CBs reports periodically to CPOs errors in their systems a new database will increase lack of consistent information which may reflect in low credibility by the industry. - If a major initiative is initiated, then should not be a mere directory of certified companies but a mean to gather better data analysis of food sectors, countries and type of organization. There are concerns on the ownership of such information and how will be made available. - A database this powerful will be a source of information to regulatory bodies. A concern exists on where will be the boundaries in the existing confidential agreements between CB's and organizations."	●**Risk identified**- will be considered as part of detailed development of the project. ●**Agree** –Identified benefit.
9.	Number 7.	CB	"We are supportive of this concept only if the central platform replaces all CPO databases OR if the CBs are not required to populate (and the data transfer is either automated or CPOs are responsible for input of data)."	●**Risk identified**- will be considered as part of detailed development of the project.
10.	Number 8.	CB	"Agreed with the needs of harmonization in database which could enable access for the industry but with limited information which would not disclose any commercial information or relationship between CBs and FBOs."	●**Agree** –Identified benefit.
			"GFSI certificate platform should be created to replace existing CPOs ones and not request additional work for CBs and increase risks of gaps."	●**Misunderstood** – the GFSI platform would not replace the current CPO platform Risk identified- will be considered as part of detailed development of the project.
			"This should be done in a way to promote GFSI	●**Risk identified**- will be

			high level standard to be reach by FBOs by including Global Markets and not to discriminate organisations not yet GFSI certified."	considered as part of detailed development of the project.
11.	Number 12.	CB	"The objective would be to not repeat and duplicate the same requirements. CPO integrity program requirements should focus on specific interpretation of their certification program."	●**Identified opportunity**- a good idea not related to the RTTT feature but one that GFSI will consider moving forward.
12.	Number 16.	CB	"There is general agreement that a centralised certificate platform would benefit the industry as a whole and provide better access and control over how certificates are maintained. It would be important to consider maintaining the confidentiality of commercial relationships between CBs and FBOs."	●**Agree** –Identified benefit.
			"It would also be recommended that a similar database be used for sites participating in the Global Markets Program, to allow for those organisations to be recognized."	●**Identified opportunity**- a good idea not related to the RTTT feature but one that GFSI will consider moving forward.
			"There is also a potential for GFSI to work with IAF to create a platform that would capture all accredited certifications and provide a more comprehensive platform."	●**Agree** – taking forward.
13.	Number 24.	CB	"1) A coordinated approach would be a help to reduce multiple audits undertaken by CBs."	●**Agree** –Identified benefit.
			"2)CBs shall have insight into these KPIs and must be part of the working group on this. KPIs shall be harmonised among the schemes and KPIs shall be defined for serving the purpose (e.g. number of NC during an audit is not a good indicator and could lead to inefficient audits in itself).By definition should this not already be the intent of the 'accreditation' process; as we know perceived inadequacies of the accreditation audit process over the years has led to the need for CPOs to enact their own KPIs and measures of CB performance and compliance – therefore consideration needs to be given to how all stakeholders needs can be captured through a single set of measures and verification process."	●**Identified opportunity**- a good idea not related to the RTTT feature but one that GFSI will consider moving forward.
			"3)Consideration needs be given to competencies of personnel with responsibility for monitoring and assessing conformance."	●**Identified opportunity**- a good idea not related to the RTTT feature but one that GFSI will consider moving forward.
14.	Number 32.	CB	No comments.	
15.	Number 4.	Consultant	"GFSI and IAF should work together. While a standalone GFSI platform could reasonably expect to capture all the FBO certifications to GFSI benchmarked schemes, it could not capture other accredited certifications under ISO 17021/22003-1 or ISO 17065/22003-2. These would include	●**Agree** – taking forward.

			certifications to ISO 22000:2018 and to a wide range of certification schemes in food, feed and animal food. To serve all stakeholders, including regulators, other food businesses, etc. the broadest scope possible should be defined within the parameter of an "accredited" certification."	
16.	Number 5.	AB	No comments.	
17.	Number 11.	AB	No comments.	
18.	Number 17.	AB	"If GFSI proceeded with their own specific certificate platform this would demonstrate a lack of collaboration with one of their key stakeholders. Creating a GFSI-specific certificate platform will be a negative impact on trust because an impartial and neutral platform i.e. IAF Cert Search is already available. It would be seen as a contradiction to GFSI's strategic objective on harmonization because it will create another database in an already fragmented landscape of different schemes and databases."	●**Risk identified**- will be considered as part of detailed development of the project.
19.	Number 29.	AB	No comments	
20.	Number 10.	Manufacturer	"A GFSI hosted and driven certificate platform is absolutely essential to facilitate public and private sectors and overdue. Secure information viewing and secure information sharing between agreed parties will help agreeing parties to share information faster and create value. No one is in a better position than GFSI to connect collaboration and assert the value of GFSI's brand. The CPO's that embrace collaboration and facilitate information sharing will succeed!"	●**Agree** –Identified benefit.
21.	Number 15.	SaaS Provider	No comments	
22.	Number 20.	SaaS Provider	"If GFSI then had an auditor module this information could automatically populate it to greatly reduce the administration time and improve the efficiency during their auditing process."	●**Identified opportunity**- a good idea not related to the RTTT feature but one that GFSI will consider moving forward.
			"An FBO portal linked to the platform would support them in the maintenance of the certificate including historical data of previous audits, scheduling of upcoming audits and management of NCRs. It could also manage self-assessment documentation prior to onsite or offsite audits."	●**Misunderstood** – the proposed platform does not intend to replace the CPO and CB audit management platform.
23.	Number 21.	Retailer	"While I am not a proponent of CPO X , their notification to "members" of a certificate concern is a strength and this could be a feature that should be considered in enabling access to certificate data."	●**Agree** –Identified benefit.

			"Additionally, to make Feature 4 successful, auditors need to learn how to write a report that details the finding without revealing proprietary information. Auditors and auditees need to discuss in advance of the report what that information would be. For instance, if a kill step has a certain set of parameters and those are not being met, the auditor could say: "the CCP temperature result is 3 degrees C below the critical limit minimum...as opposed to the CCP requires a minimum of 100 degrees C and the actual temperature being run was 97 C." There are ways to provide details and data without putting someone's IP into the report. This feature would need to have an opportunity for FBOs to request review of the report before it is posted...with strict guidance on what can be requested to be removed. For instance, an FBO could not request a finding be changed without a significant and rigorous redress process (this is already present with CBs- but could be more transparent...also provides insight into auditors whose findings creep beyond scope of the criteria)."	●**Identified opportunity**- a good idea not related to the RTTT feature but one that GFSI will consider moving forward.
			"To turn on the feature, I would recommend the board members who are FBOs first test out the feature and demonstrate to other FBOs how this works. Then I would invite other FBOs to volunteer to be early adopters and gain recognition for doing so. Finally, when it comes time to make this feature open to all, rather than having a bunch of FBOs fighting the change, they will be clamoring to get on the site instead."	●**Agree** –Identified benefit.
24.	Number 22.	Retailer	"The significant variability of current processes managed by CPOs make it difficult to determine a site certification status the information provided within the central repository by the CBS/CPOs for each certification should be consistent and include whether the audit was completed announced / unannounced and if any elements of the audit were completed remotely in addition to site information, address, etc. and certificate expiration information and product scopes."	●**Agree** –Identified benefit.
25.	Number 28	Retailer	"1)We recommend adding the audit report and corrective actions to the platform that customers could access with permissions."	●**Misunderstood** – the GFSI proposal only includes certificate data, it does not include audit report data.
			"2)We recommend having a "flag" for companies that jump from CPO to CPO."	●**Agree** –taking forward.
			"3)It would be great to have the ability to trend audit performance over time (vs. only access to the current year) to better assess the supplier and potential risk."	●**Agree** –taking forward.

			"4)We would also find value in having the ability for users to create an account and customer monitoring of suppliers. Any time those suppliers have a change (new audit, score slipped, required a 6-monthly audit, etc) it would send an alert to the user."	●**Agree** –taking forward.
26.	Number 25	CB Association	"2)Moreover, the repository should not increase the administrative requirements for CBs regarding logging, maintaining and updating data. On the contrary, the GFSI certificate platform should be created to replace existing CPOs ones."	●**Risk identified**- will be considered as part of detailed development of the project ●**Misunderstood** - the proposed platform does not intend to replace the CPO and CB audit management platform.
27.	Number 19.	CB Association	"One consideration for GFSI is using IAF CertSearch to deliver this objective, delivering even greater efficiency."	●**Agree** – taking forward.
			"The provision of data from CBs to external sources is a resource intensive and expensive operation. We would like to see the GFSI platform enable CBs to enter all appropriate data required for all elements of the GFSI system (including the individual CPOs) to the GFSI platform as a single point."	●**Misunderstood** – the proposed platform does not intend to replace the CPO and CB audit management platform.
			"We have been extensively involved with development of the IAF CertSearch database and would be pleased to offer its assistance to GFSI in the development of this GFSI platform."	●**Agree** – taking forward through engagement plan.
28.	Number 26.	Food Regulator	"We urge GFSI to align the access levels for regulators with the Codex guidelines – in particular Section F: Criteria to assess the credibility and integrity of vTPA programmes – Data sharing and Information exchange."	●**Misunderstood** - GFSI will work in compliance with the CCFICS vTPA guidelines. GFSI as a global benchmarking organisation with a unique model has the ability to provide overarching data that individual CPOs cannot provide. Through this platform GFSI will communicate about the certificate status and information in a certificate. GFSI will not communicate further information and access levels for regulators or any stakeholders to information like audit reports which is confidential information.
29.	Number 31.	Benchmark Leader	"1) The certificate platform should contain at minimum the certificate for public consultation, increasing the transparency of the GFSI recognized certification program."	●**Agree** –Identified benefit.
			"2)Furthermore, the platform could be used to allow the share/consultation of the audit reports between the CPO and authorised parties (e.g., GFSI and national regulators).	●**Misunderstood** – the GFSI proposal only includes certificate data, it does not include audit report data.

			The audit report is a relevant document to understand the FBO food safety level and the consistency of the audit carried out by the certification bodies."	
30.	Number 27.	Food trade association	"2)We recommend consulting with FDA representatives as this system is developed."	●**Agree** – taking forward through engagement plan.
			"3)As access is determined, we also recommend providing FBOs with the opportunity to share their certificate on the platform to their customers as needed."	●**Agree** – taking forward.
31.	Number 2.	Retailer	No comments.	

Next Steps

GFSI would like to thank all of those consultees for supporting the Conceptual Framework the 'Race to the Top' and for providing detailed and well considered responses to the four RTTT features. Alongside the specific comments we received about the RTTT, consultees also provided ambitious ideas about other work GFSI could consider taking forward. Whilst we have no plans to take these suggestions forward at this time, we are committed to keep them under review for future consideration as the RTTT plan evolves.

It is fair to say that consultation responses illuminated a significant number of misconceptions about our intended plans linked to the RTTT framework. This is unsurprising given the conceptual nature of the framework however GFSI would like to reflect upon these to ensure that we continue to resolve these misconceptions adequately moving forward.

We have also been reflecting through the process of responding to the consultation on the make-up of the consultees. This has highlighted an issue in that only our closest stakeholder groups made representation via the consultation. We recognise that the RTTT will be impactful beyond such groups and we need to consider how we widen our participation and reach to enable our messages to be heard not just by those stakeholders closest to us.

It would be our intention to move forward with the design, development and implementation phases of each of the four features and we will be delighted to be able to publish our engagement plan shortly inviting all stakeholders within our community to join us in taking the RTTT to the next level.

As we move to the next phase, we will be looking to work together across our community collaboratively to ensure maximum impact. We are excited to move to the next phase and to work with you all to achieve our outcomes together, united for safe food for consumers everywhere.

Thank you all.
Kindest,

Erica Sheward
Director, GFSI
The Consumer Goods Forum
July 2020

APPENDIX

Appendix
Stakeholder Consultation

Implementing the GFSI Conceptual Framework for The 'Race to the Top'

GFSI - April 2020
Erica Sheward, GFSI Director

1. Introduction

3.1.   GFSI is inviting all interested stakeholders to comment specifically on 4 features of a plan ratified by the GFSI Board in February 2020 in Seattle which will require fundamental changes to the way that GFSI works with its major stakeholders.

3.2.   The ambitious conceptual framework forms part of an ambitious programme of modernisation of GFSI named the *'Race to the Top'* (RTTT). The RTTT is intended to address the specific challenges GFSI has been facing in relation to trust and confidence in GFSI certification outcomes.

3.3.   The 4 specific features of this consultation were shaped with the support of our stakeholders most specifically the IAF Taskforce (a group comprising representatives from accreditation bodies (ABs) and Certification Bodies (CB)s and Certification Programme Owners (CPOs) who provided significant inputs between the GFSI Board meeting in Chengdu in October 2019 and our GFSI Board meeting in Seattle in February 2020.

3.4.   The purpose of this consultation is to set out in detail the current conceptual framework as approved by the GFSI Board. We are seeking to gain feedback and insights on the framework itself from those stakeholders most impacted.

3.5.   We welcome any views on how best to implement the proposed framework. We are also hearing stakeholder views as to the interoperability of each of the 4 features.

3.6.   The specific questions GFSI would like your feedback on can be found in appendix 1 of this document and we would ask you to respond to them by completing our survey in Appendix 1 and returning it to gfsibm@theconsumergoodsforum.com by noon CET on **18th May 2020**.

3.7.   Please ensure that you read this document in its entirety before proceeding to provide your responses.

3.8.   Please feel free to circulate this document to others within your organisation who you feel should also be consulted or who we may not have reached. A full list of respondent groups can be found below.

Who is this consultation for?

3.9.   Certification Programme Owners (CPOs) who have certification programmes recognised by GFSI.

3.10.   Certification Bodies (CBs) who deliver audits against one of the [GFSI-recognised Certification Programmes](#).

3.11.   Accreditation Bodies (ABs) signatories of the IAF MLA (International Accreditation Forum Multilateral Recognition Agreement).

3.12.   Regulators responsible for the implementation of national food control systems.

3.13.   Organisations responsible for the design and delivery of robust education and Continuing Professional Development programmes (CPD).

3.14.   NGOs and IGOs who have an interest in food safety, GFSI activities or any of the activities described in this consultation e.g. training organisations, professional bodies or capability building organisations.

3.15.   Food Business Operators (FBOs) certified to/are on the pathway to certification with a [GFSI-recognised Certification Programme](#).

3.16.   Trade Associations/ Bodies representing the food industry.

3.17.   CGF Member organisations who are not currently represented on the GFSI Board.

3.18.   Consumer groups

Issue Date and Enquiries

3.19.   April 2020. For all enquiries, please contact gfsibm@theconsumergoodsforum.com. Closing date for responses to the consultation: **Noon 18th May CEST**.

3.20.   Please note any responses received after this time may not be considered.

3.21.   Please note **we are not consulting** on the four elements of the conceptual framework itself (as they have already been ratified by the GFSI Board) we are consulting on insights and feedback from our stakeholders as to how the framework can best be implemented and what critical factors we will need to consider.

2. About this consultation

2.0.   Over several decades, the world has seen numerous food safety crises in the headlines, eroding consumers' trust in the safety of the food they buy, the brands they love and even the food industry at large.

2.1   [The Global Food Safety Initiative](#) (GFSI) was created in 2000 to help address this global issue and is the ground-breaking initiative of The Consumer Goods Forum (CGF), a global industry network, working to support Better Lives Through Better Business. GFSI aims to build consumers' trust in the food they buy – no matter where their food has come from, nor where in the world they live – by improving food safety management practices.

2.2   GFSI has grown into a vast, global multi-stakeholder community. We enable the extensive collaboration that is so critical to ensuring a safe global food system, involving both the private and public sectors.

2.3.   The GFSI community works on a volunteer basis and is composed of the world's leading food safety experts from retail, manufacturing and food service companies, including supply chain actors in all product categories, international organisations, governments, academia and service providers to the global food industry. Our vision is for safe food for consumers everywhere.

2.4.   Over the past 20 years, GFSI has presided over a community which delivers food safety assurance through benchmarking and the harmonisation of food safety programmes which are recognised as meeting the GFSI Benchmarking Requirements. The GFSI ecosystem relies on multiple actors playing multiple parts in delivering food safety audits and certification upon which the global food industry relies.

2.5   The original genesis of GFSI focussed on setting requirements for food safety globally in a non-competitive way. The [GFSI Benchmarking Requirements](#) provides a high-level framework against which individual food safety certification programmes can be assessed. In short, GFSI is responsible for the food safety '*what*' not the food safety '*how*.'

2.6   Over the past few years, trust and confidence in third-party certification to deliver food safety assurance has been challenged. The quality of the outputs of some audits leading to certification to a GFSI-recognised Certification Programme has been questioned. There has been

an understandable concern about the efficacy of audits and more specifically the competence of some food safety auditors themselves.

2.7   Linked to point 2.6 above it is important to underscore the incredible importance of the role that food safety auditors play in supporting GFSI, delivering trust and confidence in food safety standards globally and ensuring that we move closer to achieving our mission of safe food for consumers everywhere. Each and every element of the RTTT will be designed to supporting the development and sustenance of excellent food safety auditor professionals.

2.8   Consulting with strategic stakeholders, GFSI has recognised that the issues lie not just with the auditors but with the entire mechanism leading to certifications to a GFSI-recognised Certification Programme, and overseen by the CPOs, the CBs and the ABs.

2.9.   In Chengdu, China in October 2019, the GFSI Board convened to discuss the ongoing challenges which they felt were inherent in the quality of GFSI certificates. They shared industry data which highlighted stark contrasts between the quality of GFSI third-party audits and their own second-party food safety audits.

2.10   The GFSI Board concluded that despite best efforts to improve aspects of the GFSI ecosystem, trust and confidence in GFSI certificates was at an all-time low and something radical had to be done and at pace, to address the inherent audit outputs.

2.11.   The GFSI team committed to developing and delivering a bold new vision designed to shape what was termed the 'Race to the Top' (RTTT) and at the following GFSI Board meeting in Seattle, US in February 2020 the GFSI Board unanimously voted in favour of an initial suite of measures specifically designed to improve the sphere of influence that GFSI had over its entire food safety certification and assurance system.

2.12.   The RTTT is the sum total of multiple work streams and projects designed to ensure that there is a fundamental shift in culture from 'compliance being enough', to a new era and demands for 'continuous improvement' at all touch points within the GFSI sphere of influence – CPOs, CBs, auditors and the FBOs themselves.

2.13.	The conceptual framework of GFSI's modernisation combines to deliver a bold vision and to enable the RTTT. In broad terms, GFSI is moving to assume **explicit oversight for what good looks like in all aspects of the GFSI ecosystem.**

The conceptual framework includes the following elements;

- Developing harmonisation and benchmarking requirements for providers of food safety auditor training and ongoing Continuing Professional Development (CPD).
- Moving to deliver a process of ongoing assessment and continuous alignment to the GFSI requirements for CPOs.
- Developing a collaborative approach to the management of Certification Bodies between CPOs, Accreditation Bodies and GFSI.
- Developing a certificate platform - enabling access to certificate data of all FBOs certified to a GFSI-recognised Programme.

2.14	The vision depends upon breaking down the current silos where performance information is held. It requires an information infrastructure where information is input once, then made available to relevant stakeholders on a "need to know" basis. Centralisation of the information facilitates effective governance and protection of the information, whilst enabling GFSI to oversee and exercise control over all the factors which impact on the integrity of the GFSI benchmarking process.

2.15	It is important to note that the projects linked to the RTTT are not only confined to the 4 features set out in this consultation however those contained herein are those which require multi stakeholder participation and engagement.

2.16	In summary, the RTTT will require multi stakeholder contributions and commitment to a new era of GFSI that is revolutionary in how it deals with the challenges we collectively face. This consultation marks the start of that process of change and we warmly invite you to participate and support us in its delivery. We are committing to not just delivering seismic improvements but ensuring that measurement improvements are at the heart of everything we and our stakeholder community are delivering.

Thank you for taking the time to participate we look forward to receiving your contributions

RTTT – Feature 1.

Developing harmonisation and benchmarking requirements for providers of food safety auditor training and ongoing Continuing Professional Development (CPD)

3.0.   By moving to deliver GFSI Benchmarking Requirements for auditor training and ongoing CPD as set out in the plan to deliver the RTTT, GFSI plays to its technical and professional strengths and via the establishment of GFSI-recognised providers of food safety auditor training and ongoing continuing professional development (CPD), further supports the professionalisation of food safety auditing as a career.

3.1.   There is a need to facilitate the development of a distinct profession of food safety auditing to create parity of esteem with other auditing professions such as financial auditing. Currently, whilst the role of a food safety auditor is critical to the safety of the population, there is no recognised profession, leading to the twin issues of a lack of accountability and standards, and the lack of a visible and practical career path in food safety auditing for school leavers and university graduates, leading to shortages of suitably qualified and competent auditors.

3.2.   This feature of RTTT will create the foundation documents of a professional framework, a competency framework, a code of practice, and a document defining what is expected of a food safety professional across all aspects of their activity including professional development.

3.3.   Using these foundation documents, a road map will be created to boost entry into the profession at a variety of entry points and allowing prior learning and expertise to be certificated. All GFSI-recognised providers of food safety auditor training and ongoing Continuing Professional Development (CPD), will be required to show how their provision onto the road map to maintain their recognition.

3.4.   This recognition programme will be followed by a requirement that only auditors trained by such organisations and members of GFSI-recognised CPD programmes be employed by CBs to deliver audits against GFSI-recognised certification programmes. This will have the impact of fostering mutual recognition to reduce the training burden on auditors whilst increasing confidence in competence.

3.5.   The establishment of a profession and clearly defined career routes within it based upon the road map will enable all stakeholders to promote food safety auditing as an attractive career. This will create a wider talent pool from which businesses can recruit auditors and this will further drive up the standards of auditing.

3.6.   **Timeline:** GFSI will publish the requirements in February 2021, thus changing the CPO requirements in 2022 when GFSI-recognised organisations are available.

RTTT – Feature 2.

Delivering a process of ongoing assessment and continuous alignment to the GFSI requirements for CPOs

4.0   Currently the level of GFSI oversight of CPO performance is undertaken in 2 ways; bi-annual desk top review and annual benchmarking visit by the benchmark leader and the GFSI technical team member.

4.1   The proposal is that GFSI has mechanisms to deliver continual oversight of CPO performance. This oversight will measure CPO performance against GFSI requirements for standard operating procedures (SOPs), KPIs to monitor performance against the SOPs, and mechanisms to address non-compliance issues and poor performance.

4.2   The CPOs will self-report their capability via a secure IT platform that will provide oversight facilities for GFSI.

4.3   The self-reporting by CPOs will include a requirement for CPOs to demonstrate root cause analysis of deviation and continuous improvement on performance.

4.4   The bi-annual desktop review and annual benchmarking visit by the benchmark leader and the GFSI technical team member will be replaced by a random sample of audits conducted by a GFSI technical team member, together with an annual review for all CPOs, which will combine on-line scrutiny with a more focused annual benchmarking visit.

4.5   **Timeline:** Self reporting requirements January 2021

RTTT – Feature 3.

Developing a collaborative approach to the management of Certification Bodies between CPOs, Accreditation Bodies and GFSI

5.0   GFSI is aware that the current monitoring activities of the CBs is undertaken by multiple actors – CPOs (GFSI via oversight of CPOs) and ABs.

5.1   Oversight of the CBs is currently undertaken in silos, with no one organisation sharing CB performance data with another making a cumulative and correlated assessment of CB performance impossible.

5.2   GFSI is moving to create a facilitated data exchange of CB performance information between all key performance oversight actors i.e. CPOs, ABs and GFSI to improve efficiency and efficacy of monitoring.

5.3   This collaborative monitoring activity allows CBs to showcase to all interested parties their combined excellence and also allows overseers to move to collectively identify poor performers.

5.4   This approach is designed to be collaborative based on agreed, common performance indicators – GFSI Benchmarking Requirements and accreditation criteria.

5.5   GFSI proposes a multi-stakeholder taskforce to deliver rigorous CB performance oversight which could include CB organisation representatives as well as GFSI-recognised CPOs and ABs via the IAF.

5.6   **Timeline:** The multi-stakeholder taskforce will be targeted to identify the proposed performance indicators by December 2020. GFSI will work to establish a collaborative platform by July 2021.

RTTT – Feature 4.

Developing a certificate platform - enabling access to certificate data of all FBOs certified to a GFSI-recognised Programme.

6.0.   GFSI certificate data is currently held by CPOs and CBs i.e. GFSI has no access to information which would allow us to know which FBOs were certified to a GFSI recognised programme, how many there are at any given time, and where in the world they are.

6.1   There is an acceptance that building trust and confidence in GFSI certification is directly linked to greater transparency of certificate data.

6.1.   GFSI is proposing the development of a central repository offering different levels of access to different stakeholder groups – GFSI team, Regulators, GFSI Board Member companies and potentially more broadly to Food Business Operators. These levels of access will need to be determined as part of this project in compliance with applicable regulation.

6.2.   This repository represents a concerted effort to improve transparency and ease of access of certificate status data throughout the GFSI ecosystem. Transparency is a critical feature of building trust which stakeholders tell us is missing.

6.3.   This repository will improve the ability of GFSI certified businesses to make themselves visible to the stakeholders they are seeking to engage with. Equally manufacturers and retailers looking to procure from GFSI certified suppliers will be able to do so with ease.

6.4.   An intended outcome of this project is to support the ongoing development of Public Private Partnerships by enabling national regulators with responsibility for national food control systems a level of access to certification data to be determined.

6.5.   The implementation of the repository would negate the current requirement for CPOs to provide GFSI with the quarterly manual declaration on certificate numbers, which, they have reported to GFSI, is resource intensive.

6.6.   CPOs would still have the opportunity to validate any information used by GFSI for invoicing purposes.

6.7.   **Timeline:** January 2021

Consultation on the GFSI conceptual framework – The Race to the Top

Name:

Role within organisation:

Name of your organisation:

Your organisation is:

- Certification Programme Owners who have certification programmes recognised by GFSI.
- Certification Bodies who deliver audits against one of the GFSI-recognised Certification Programmes.
- Accreditation Bodies signatories of the IAF MLA
- Regulators responsible for the implementation of national food control systems
- Organisations responsible for the design and delivery of robust education and Continuing Professional Development programmes (CPD)
- NGOs and IGOs who have an interest in food safety, GFSI activities or any of the activities described in this consultation e.g. training organisations, professional bodies or capability building organisations.
- Food Business Operators (FBOs) certified to a GFSI-recognised Certification Programme.
- Trade Associations/ Bodies representing the food industry
- CGF Member organisations who are not currently represented on the GFSI Board

Further Information:

- Please provide your comments in relation to each of the features of the GFSI conceptual framework below.
- Please note and as previously mentioned we are not seeking your views on whether the individual or collective features of this framework should be developed and implemented as that decision has been taken by the GFSI Board.
- GFSI is interested to receive you input/suggestions as to how each feature should be developed and implemented and which stakeholders should be involved.
- GFSI is particularly interested to hear from stakeholders as to the role they feel they can play in developing and implementing the conceptual framework.
- It is not necessary to provide feedback on all features of the framework if you do not think relevant to you or your organisation.
- Please complete and return to GFSI via gfsibm@theconsumergoodsforum.com by **Noon CET 18th May 2020**.

RTTT – Feature 1.

Developing harmonisation and benchmarking requirements for providers of food safety auditor training and ongoing continuing professional development (CPD)

Word Count 200 words

RTTT – Feature 2.

Delivering a process of ongoing assessment and continuous alignment to the GFSI requirements for CPOs

Word Count 200 words

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RTTT – Feature 4.

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Word Count 200 words

THANK YOU