



# STAKEHOLDER CONSULTATION - STRATEGIC REVIEW OF THE GFSI GLOBAL MARKETS PROGRAMME

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# Introduction

- 1.1. We are inviting all interested stakeholders to respond to this consultation to help GFSI shape the future of the GFSI Global Markets Programme (GMaP).
- 1.2. This consultation has been created following detailed evaluation of responses to GFSI surveys from September 2020, where we asked GMaP users for feedback.
- 1.3. Please ensure that you read this document in its entirety before providing your responses, and submit the survey by clicking on the link. The closing date for all responses is: **2<sup>nd</sup> April at midnight CEST**.
- 1.4. Please feel free to circulate this document to others to ensure we gain maximum feedback.

## Who is This Consultation For?

- 1.1. FBOs who are current or previous users of the GMaP.
- 1.2. Certification Programme Owners (CPOs).
- 1.3. Certification Bodies (CBs) who deliver audits.
- 1.4. Members of the GMaP Committee and previous GMaP Award Winners.
- 1.5. Consultants delivering training and/or assessment against the GMaP, and organisations responsible for the education and Continuing Professional Development programmes (CPD).
- 1.6. Regulators responsible for the implementation of national food control systems and interested in food safety capability building tools.
- 1.7. NGOs and IGOs engaged in food safety or GFSI activities described in this consultation e.g. training organisations, professional bodies or capability building organisations.
- 1.8. Trade Associations/Bodies representing the food industry.

## Issue Date and Enquiries

- 1.1. January 2021. For all enquiries, please contact [gfsinfo@theconsumergoodsforum.com](mailto:gfsinfo@theconsumergoodsforum.com). Closing date for responses to the consultation: **2<sup>nd</sup> April at midnight CEST**.
- 1.2. Please note any responses received after this time may not be considered.
- 1.3. GFSI will aim to publish its response to this consultation by the end of Q2 2021.

## About this Consultation

2.0. The Global Food Safety Initiative (GFSI) was created in 2000, in response to numerous food safety crises, which were eroding consumers' trust in the safety of the food, the brands and the wider food industry.

2.1. GFSI is one of the 4 pillars 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 by improving food safety management practices.

2.2. GFSI has grown into a global multi-stakeholder community which enables extensive collaboration critical to ensure a safe global food system for both the private and public sectors, with a vision for safe food for consumers everywhere.

2.3. The GFSI community is composed of volunteers who are food safety experts from retail, manufacturing, food service companies, international organisations, governments, academia and service providers to the global food industry.

2.4. For the last 20 years, GFSI has coordinated an ecosystem community that relies on multiple actors playing multiple parts in delivering food safety through three strategic priorities;

- Benchmarking and the harmonisation of food safety programmes;
- Public-private partnership programmes
- Capability building activities.

2.5. The GFSI Benchmarking Requirements provide 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. With the development and evolution of the GFSI Benchmarking Requirements came the need to create a dynamic and systematic route to third-party certification for small and developing businesses who had aspirations to be certified but who lacked the internal resource and food safety management system expertise to achieve it.

2.7. GFSI developed the GFSI Global Markets Programme (GMaP) capability tool in 2008, to support small or less developed FBOs to achieve certification to a GFSI-recognised food safety programmes and to improve market access.

2.8. The aim was to help target companies develop effective food safety management systems through a systematic continuous improvement process through the following specific objectives:

- To provide a route for small and less developed businesses to achieve accredited certification.
- To support capability building efforts and improve market access opportunities for small suppliers operating locally.

2.9. The GMaP is a voluntary programme, with a toolkit which contains a food safety checklist and a protocol to drive continuous improvement. Companies may choose to use the GMaP, or they may decide to implement the programme as part of business development activities in manufacturing sites and/or primary production. It is a free access tool and voluntary programme that businesses can use to implement according to their needs and strategic objectives. The documents provide guidance to the food businesses, service providers and stakeholders in the form of a toolkit.

2.10. The GMaP was originally designed as an introductory three-step programme towards full GFSI- certification. It was never intended to be a fully stand-alone programme, which unintentionally could devalue full certification. The end destination was always full certification after a three- year process.

2.11. During the last 10 years, various pilot programmes have used the GMaP checklists to introduce food safety management systems into smaller and less developed businesses around the world. Pioneer countries include the Ukraine, China, Japan, Russia, Chile, Malaysia, USA and Zambia amongst many others. Businesses participating include retailers and brand manufacturers in partnership with international organisations and universities who have funded training and mentoring programmes to raise awareness and build capability.

2.12. Despite GFSI success in driving improvements in food safety capabilities through the GMaP, there is no room for complacency.

2.13. In September 2020 GFSI launched a strategic review of the GMaP of which this consultation is a critical part.



# The GMaP Strategic Review and the GFSI Race to The Top

3.0. In 2020 GFSI launched a radical suite of initiatives designed to improve trust and confidence of the GFSI brand. This conceptual framework is called ‘The Race to the Top.’

3.1. The RTTT framework proposes enhancement of oversight of the GFSI ecosystem with the aim of improving trust, transparency and confidence in GFSI-recognised certification and audit outcomes. Additionally, GFSI is seeking to stay true to its core purpose as a benchmarking and harmonisation organisation responsible for the ‘what’ – not the ‘how’ – of food safety.

3.1. Four fundamental features of the RTTT framework were shaped with the support of stakeholders, comprising representatives from Accreditation Bodies, Certification Bodies, Certification Programme Owners, members and the broader industry who provided significant inputs between the October 2019 and February 2020 GFSI Board Meetings.

3.2. This framework was shared for formal stakeholder consultation in the Spring of 2020.

3.3. When responses to the RTTT consultation were reviewed, GFSI noted a significant number of concerns from stakeholders specifically relating to the efficacy and integrity of the GMaP.

3.4. Given the fact that no strategic review of the GMaP programme had been undertaken since its launch in 2010, it seemed timely to consider a review of the GMaP during the second phase of the RTTT.

3.5. In September 2020, we launched two surveys, one for users of the GMaP and one for wider stakeholders (Appendix 1 and 2), to gain insights into stakeholders’ thoughts about the GMaP and how it was delivering against the original capability building intended outcomes.

The objectives of the surveys were to evaluate and investigate:

- The existing GMaP toolkit and its suitability to deliver on the GFSI strategic priority of capability building;
- The efficacy and integrity of the current GMaP toolkit and/or brand by CPOs and CBs;
- Best practice examples where the GMaP toolkit use has achieved its intended outcomes and any recommendations as to how we replicate this.

3.6. The survey questions were specifically designed to gauge the GMaP success against the three objectives listed above and were responded to by 60% of the target audience.

3.7. GFSI recognises that the ability of the GMaP to achieve its strategic objectives is dependent on clear outcomes for the programme being defined.

3.8. The original outcomes GFSI was seeking to achieve through the GMaP programme were to improve the food safety management systems of FBOs who were not certified to a GFSI-recognised programme. In 2020 the GFSI Board re-visited these outcomes and agreed to broaden them to ensure that the capability building work undertaken by GFSI included initiatives to support catering, hospitality and humanitarian aid where certification would not necessarily be the end goal.

3.9. GFSI's food safety capability building ambitions have to encompass all settings where safe food for consumers are at risk

3.10. Evaluation of the survey results together with the initial intelligence received via the RTTT consultation has led GFSI to conclude that whilst the GMaP has a number of positive aspects, ultimately it is failing to achieve the GFSI strategic capability building priority in target markets.

3.11. In light of all of the feedback GFSI has received, it is an absolute priority that GFSI now move to formally consult on what challenges and opportunities may arise from a potential restructuring and reshaping of the GFSI GMaP.

3.12. This consultation provides the GFSI community an enhanced food safety capability building agenda with the outcome of enabling us to support tangible improvements in food safety management expertise regardless of the size and scale of the company, whether operating in a domestic or global supply chain.

3.13. GFSI has aggregated the outcomes from the RTTT consultation as they relate to the GMaP alongside the GMaP survey responses into six themes around which we believe we need to more widely consult with our stakeholder community with a view to making positive change;

- A. Establishing the basis and the need to change the GFSI GMaP.
- B. Differentiating the GFSI GMaP from GFSI-recognised certification.
- C. Exploring the benefits of widening the scopes of the GMaP in line with GFSI benchmarking scopes.
- D. Reviewing the GMaP Governance arrangements.
- E. Enhancing the GMaP efficacy and integrity and meeting GFSI capability building outcomes.
- F. Defining the role of the GMaP delivery partners.



## Section A. Establishing the Basis and the Need to Change the GFSI GMaP

### **Background:**

Based on the first question from the surveys, almost half (46%) of the participating businesses were dissatisfied. Even acknowledging the limited numbers who responded to the surveys, this represents a high level of dissatisfaction.

As previously mentioned, concerns were also raised about the integrity and efficacy of the GMaP via the separate RTTT consultation in April 2020.

### **Proposed Options and Rationale:**

#### **Option 1: Leave the GMaP unchanged**

The strategic review of the GMaP highlighted an opportunity to reflect on comments and concerns raised by multiple stakeholders. However, we acknowledge that surveys are largely responded to by those who are dissatisfied with something and do not always reflect the views of those who are happy with the status quo.

**Pros:** The GMaP has been widely adopted and is recognised within the industry.

**Cons:** A high proportion of food businesses expressed serious dissatisfaction with the current GMaP. The survey also highlights a lack of GFSI scheme governance which may present a serious reputational risk to GFSI.



## Option 2: Focus the GMaP on capability building and implement a formal governance mechanism

This option is fully aligned to the original design but requires GFSI to refocus the GMaP and re-launch it with a new governance mechanism to ensure it can better control the process, resources and validation of the food safety capability outcomes.

**Pros:** Builds on the positive elements of the existing scheme, reduces risks to GFSI and enables a new programme to be developed which is up-to-date and fit for the needs of food businesses

**Cons:** Requires investment in redevelopment and collaboration with existing delivery partners to maximise the benefits.



## Section B. Differentiating the GFSI GMaP from GFSI-recognised Certification

### Background:

There was very little emphasis on food safety capability building as a priority in the open-ended survey responses, with much more focus for FBOs to gain external recognition for reputational and marketing reasons. This leads to an impression that many respondents regard the GMaP as GFSI 'certification-lite' rather than a rigorous process to build food safety capability in FBOs.

There is a need to separate capability building via the GMaP from third-party certification programs. Greater clarification is needed regarding the role of capability building. Therefore, there are a number of options which may be considered.

## **Proposed Options and Rationale:**

### **Option 1: Ensure and reinforce that the GMaP is solely a self-assessment scheme**

Much of the confusion comes from the perception that it is possible to achieve Basic and Intermediate level certification, which is false. The first option would be to reinforce the self assessment model.

**Pros:** Make the content available at a minimum cost and remove the ambiguity of GFSI's validation of the findings by third-party certification bodies.

**Cons:** May reduce adoption of the scheme, reduce interest in the programme, and make the step to certification too large.

### **Option 2: Allow certification of the GMaP**

The second option is for GFSI to formally recognise an "existing unofficial practice," and allow the certification of capability building at basic and intermediate levels.

**Pros:** The existing system has recognition in the marketplace.

**Cons:** Much of the confusion with the current GMaP is from certificates being issued against the results at the Basic and Intermediate level, and leaving as is perpetuates confusion.

### **Option 3: Remove the opportunity for two-stage certification model and provide alternatives**

The third option would be to build a model where the predominant mechanism is self-assessment, but defines the requirements to provide evidence of capability building so it can be externally scrutinized.

**Pros:** Provides clear differentiation from certification, promotes transparency and emphasises continuous improvement.

**Cons:** Would need to show some short-term activity to demonstrate a genuine commitment to progress against the programme in line with progression towards third-party certification.





## Section C. Benefits of Aligning GMaP Scopes with Benchmarking Scopes

### Background:

The current scope of the GMaP is limited to manufacturing and primary production. Responses to the surveys raised challenges around equivalence of the GMaP as it relates to the reality of the food safety capability challenges faced by industry, and which are the priority sectors.

The scopes of the GMaP versus the GFSI Benchmarking Requirements were flagged as a concern. This leads to challenges in associated areas such as: the structure and calibration levels of the toolkits; the scoring threshold and system and the emerging food safety management issues reflected in the GFSI Benchmarking Requirements but not reflected in the current GMaP.

80% of the survey respondents thought that the GMaP should be extended to other scopes, with over three-quarters of those wanting to see it expanded to cover all benchmarking scopes.

The current 22 scopes of the GFSI Benchmarking Requirements cover a wider range of topics:

- Farming of Animals for Meat/Milk/Eggs/Honey
- Farming of Fish and Seafood
- Farming of Plants (other than grains and pulses)
- Farming of Grains and Pulses
- Pre-process Handling of Plant Products
- Animal Primary Conversion
- Processing of Perishable Animal Products



- Processing of Perishable Plant Products
- Processing of Perishable Animal and Plant Products (Mixed Products)
- Processing of Ambient Stable Animal and Plant Products (Mixed Products)
- Production of Feed
- Catering
- Retail/Wholesale
- Food Broker/Agent
- Provision of Food Safety Services
- Provision of Storage and Distribution Services
- Production of Food Packaging
- Hygienic Design of Food Buildings and Processing Equipment (Building Constructors and Equipment Manufacturers)
- Hygienic Design of Food Buildings and Processing Equipment (Building & Equipment Users)
- Production of (Bio) chemicals and Bio-cultures Used as Food Ingredients or Processing Aids in Food Production

## Proposed Options and Rationale:

For aligning the scope of the GMaP with the GFSI Benchmarking Requirements, GFSI believes that there are three potential options:

### **Option 1: Align the GMaP with the scopes of the GFSI Benchmarking Requirements**

**Pros:** This would provide maximum alignment between the schemes and make clear that the GMaP is the preferred development pathway towards achieving GFSI certification, and there is evidence from the consultation that there is demand for this option.

**Cons:** This would require significant investment which may not be justified for the less widely adopted benchmarks.

### **Option 2: Expand the scope in an incremental fashion, prioritising areas where benchmarking activity is most prevalent and/or the need for capability building is identified**

**Pros:** This would provide maximum alignment between the schemes and make clear that the GMaP is the preferred development pathway towards achieving GFSI certification, and there is evidence from the consultation that there is demand for this option, whilst allowing targeted investment over time driven by demand.

**Cons:** This option would need to show some activity in the short term to demonstrate that there is a genuine commitment to expanding the scope.

### **Option 3: Leave current scopes as they are**

**Pros:** The existing scope has recognition in the marketplace, and covers the most popular areas for development.

**Cons:** It does not cover much of the activity of GFSI and does not provide a development pathway for the activity outside these two areas.



## Section D. Enhance the GMaP Efficacy and Integrity

### **Background:**

Feedback from the surveys indicated that stakeholders felt that there was no oversight of the efficacy and integrity of the GMaP by GFSI and that this was detrimental to its success.

Whilst two-thirds of participating businesses said they would be seeking certification, data derived from the survey suggests fewer businesses actually achieve GFSI certification. Less than 40% of businesses progressed due to cost, especially smaller businesses.

The integrity of all aspects of the programme is critical to achieving its strategic outcomes. Stakeholders reported a need for GFSI to mandate a clear differentiation between those delivering training around the GMaP and those delivering assessments to ensure impartiality and integrity of assessment is maintained.

Stakeholders believed that the tools developed for effective delivery (user guidance, conformity with the protocol, checklists) must be transparent, easy to access and understand to ensure that overall delivery is aligned with GFSI strategic outcomes. Survey participants reported very low use of the protocol which GFSI deems essential for the integrity of the programme delivery.

## Proposed Options and Rationale:

In order to ensure that there is improved integrity of the implementation of the GMaP GFSI believes that there are potentially three options;

### **Option 1: Revise and develop a GFSI framework to monitor how the GMaP programme is delivered (training and assessment)**

The first option provides a mechanism to deliver more consistent and coherent approaches to training and assessment of the GMaP which have been criticised by stakeholders.

**Pros:** This would be an opportunity to eliminate fears regarding ‘conflicts of interest’, misunderstandings around roles and whether delivery tools are ‘fit for purpose.’

**Cons:** This option would require significant engagement and commitment from all relevant stakeholders to make a significant change.

### **Option 2: Revise programme to provide additional oversight from GFSI on the harmonisation of the checklist and conformity with the protocol**

The second option would allow for GFSI to oversee the uses of the GMaP checklist and protocol to prevent alteration by trainers and assessors of the programme.

**Pros:** This would provide maximum alignment between providers and make clear that the GMaP is the preferred development pathway towards achieving GFSI certification.

**Cons:** Additional resources would be required, and a process of oversight would need to be established by which providers of the programme were assessed for conformity by GFSI.

### **Option 3: Leave current level of oversight of the programme as is**

The third option would mean that GFSI does not make any changes to its current level of oversight of the use of the protocol and/or the checklist

**Pros:** GFSI retains a ‘hands off’ role in the delivery of the programme relying on providers to respect the protocol and apply the necessary level of integrity.

**Cons:** Stakeholder feedback suggests that the integrity of the scheme is lacking and a more robust role for GFSI is required to improve outcomes.





## Section E. Defining the Role of the GMaP Delivery Partners

### **Background:**

Since the inception of the GMaP GFSI has engaged in with multiple stakeholder groups to establish mechanisms for delivery of the GMaP toolkit. These have been ad hoc in nature and traditionally ill defined.

Survey responses indicated that delivery partner roles need greater clarification and control. This lack of control creates confusion over the role of GFSI in the GMaP and there is evidence that stakeholders are exploiting the lack of direction and control from GFSI to breach the GMaP protocols. Additional oversight and control needs to be exercised, with more formal contractual relationships to enable more robust delivery of the strategic outcomes of the programme.

Stakeholders continued to report excessively high costs associated with the programme which were linked by some respondents as barriers to market entry and associated with a poor experience of GFSI as an organisation which adds cost in the supply chain at the SME level. GFSI needs to ensure that there is transparency on costs for the implementation of the GMaP from which GFSI derives no revenue but with which GFSI remains associated.

## Proposed Options and Rationale:

In order to ensure that there is improved integrity of the implementation of the GMaP GFSI believes that there are potentially two options;

**Option 1: GFSI should revise the programme so there are clearer defined roles and responsibilities for delivery partners. GFSI would ensure that these partnerships are formalised (where appropriate) to include the introduction of integrity monitoring measures.**

The first option involves creating a framework of clear roles and responsibilities for delivery partners and GFSI.

**Pros:** Formalising the role of delivery partners will enable greater clarity around roles and responsibilities between GFSI and wider stakeholder groups. Greater oversight and control by GFSI will enable effective monitoring and measuring of impact. Providing more rigorous frameworks and ways of working between GFSI and delivery partners may encourage more partners to participate and improve access to providers for FBOs.

**Cons:** Resource intensive requiring significant levels of buy in and collaboration to achieve.

**Option 2: Allow the delivery partners to define their own roles in any future revisions to the programme.**

The second option would enable the delivery partners to define their own roles and responsibilities in relation to their engagement with the programme as it relates to GFSI.

**Pros:** Stays true to the original programme. No barriers to entry for delivery partners.

**Cons:** Concerns over the activities of delivery partners are not necessarily addressed. Potentially no on-going ability by GFSI to monitor the integrity of the programme or measure and report on success. The costs remain high.



## Section F. The GMaP and Association With the GFSI Brand

### **Background:**

Before considering the survey response data, it is worth considering the disclaimers offered within the GMaP documentation itself in relation to governance:

- GFSI has no control over the nature of the assessments carried out using the checklist.
- Any outcome of an assessment against the items in the checklist does not imply a recommendation or endorsement by GFSI or a certificate.
- This document is provided in English using UK spelling, in line with all documents from the GFSI. Any translations used have not been provided, recognised or approved by GFSI.
- This document may be used as a source document by organisations to develop their own version of Global Markets. These may be certification programme owners recognised by GFSI or others. Though described as 'Global Markets' these may be developed and commercialised differently so are not directly comparable with the checklist or protocol or the GFSI GMaP. There is no benchmarking of such schemes by GFSI. However, GFSI expects schemes developed from this original work will follow the aim and objectives of the GFSI Global Markets Programme.



- GFSI does not control and is not involved in training carried out worldwide against the Global Markets Programme. There is no recognition or approval process for service providers. Instead, it is for the Buying Companies, their Suppliers and their Service Providers to work together to build capability and achieve competency.

One of the principal risks identified via survey responses is that the GFSI brand is associated with a scheme over which GFSI has little or no oversight. This acknowledged lack of control creates issues highlighted in the open-ended responses within the surveys, notably a variation in practice, confusion over the role of GFSI in the GMaP and evidence that some stakeholders are exploiting the lack of direction and control from GFSI.

## **Proposed Options and Rationale:**

The surveys provided evidence that suggests that the GFSI brand is associated with the GMaP in a way that is confusing and potentially detrimental. The issues raised in the survey suggest that reform of the scheme should be accompanied by revised governance to assert GFSI's role in the GMaP to establish influence and oversight in the minds of the participating businesses and the wider food production community.

The global food safety environment and therefore GFSI, have evolved since the launch of the GMaP and it should also evolve to meet the needs of the modern world and be aligned with the RTTT.

Lack of real GFSI ownership of the GMaP is causing problems from the perspective of monitoring efficacy and GFSI demonstrating it is achieving its capability outcomes. The protection of the GFSI brand is also critical as GFSI drives forward with improvements in trust and confidence around its strategic priorities of benchmarking and harmonisation of certification programmes and capability building. It is critical that users of the GMaP are not 'mis sold' as association with GFSI that does not exist.

In terms of improving trust and confidence in the efficacy and integrity of the GMaP and to prevent the GFSI Brand being brought into disrepute, there are potentially three options;

### **Option 1: Revise the GMaP governance arrangements so GFSI regains ownership and control of the GFSI Brand as well as specific programme intellectual property.**

The first option would have the benefit of defining GFSI's association with the GMaP.

**Pros:** This would provide much needed clarity to GFSI's role in the implementation of the GMaP and provide greater autonomy to move against breaches of the GMaP protocol. GFSI would be able to monitor and report on efficacy of the programme and achievements against outcomes.

**Cons:** Potential loss of the open source toolkit? Additional confusion between GFSI certified programmes and the GMaP which should not be associated with certification, and resource intensive.

### **Option 2: Disassociate GFSI with the GMaP and leave others to take the GMaP forward?**

The second option would deliver the opposite outcome in that GFSI would move to disassociate itself with the GMaP

**Pros:** This would enable others to take the GFSI capability building work forward unhindered by GFSI. GFSI brand would be protected from further reputational damage-

**Cons:** Potential fragmentation and further confusion between commercial capability building products and certification to GFSI-recognised programme. Without GFSI support the programme could cease to exist.

### **Option 3: Leave the current GMaP brand governance arrangements as they are**

**Pros:** The existing governance is well established and resource efficient to administer. The open source nature of the tool is in line with GFSI's role in the food safety ecosystem.

**Cons:** Further reputational risk to GFSI and further brand dilution. On-going inability by GFSI to measure success or oversee integrity of the delivery of its capability building outcomes via the GMaP.

## **Next Steps:**

Thank you for taking the time to read this consultation. Your views are very important to us.

Please provide your responses to the questions in each section of this consultation by completing the online response questionnaire at the following link:

<https://www.surveymonkey.com/r/R6N2PWL>

## **Appendix 1: Evaluation of Global Markets Programme (Participant Survey)**

To access this document, please follow [this link](#).

## **Appendix 2: Evaluation of Global Markets Programme (Stakeholder Survey)**

To access this document, please follow [this link](#).