

GFSI Consultation on Feature 1 of the Race To The Top

April 2021



1. Foreword

It is with the greatest pleasure that I welcome all interested stakeholders to participate in this latest consultation from GFSI.

It has been just under a year since we launched our first consultation on our initiative to drive increased trust and confidence in GFSI The Race To The Top (RTTT)

Since then we have been working with many of our closest stakeholders to shape each of the first four features. This consultation is specifically related to feature 1 of the RTTT, the work designed to support improvements in food safety auditor competence and ongoing CPD. This feature enables the development and implementation of a new set of benchmarking requirements designed to assess the efficacy and integrity of programmes supporting food safety auditor competence. We are seeking your views on the content of the benchmarking requirements themselves and also whether you believe that this approach will enable the delivery of outcomes as they relate to the successful recruitment, development and retention of excellent food safety auditors life long. We are seeking to tackle the dearth of food safety auditors by creating a pathway to professional development often enjoyed by other safety critical professions which for too long has been denied those at the frontline of food safety verification – food safety auditors. In my mind, it is too easy to simply blame auditors when things go wrong and is an affront to thousands of tremendously hard working food safety professionals around the world who commit to working tirelessly to ensure that food safety audits are delivered with rigor and professionalism.

The development of this feature provides the food safety auditors themselves with a suite of very specific benefits designed to make food safety auditing an attractive and well respected profession and to enable mutual recognition of skills knowledge and behaviours between employers negating the requirement for them to demonstrate competence multiple times to multiple organisations.

I would like to thank Marie- Claude Quentin and Jon Poole for leading this work and also those who participated in the working group and supported the output.

GFSI's commitment to deliver the RTTT remains stronger than ever and 2021 will see us move to the implementation phase at pace.

Thank you in advance for sharing your views with us through this consultation. We remain open to any questions or queries you may have.

Erica Sheward, Director GFSI

2. Introduction

- 2.1. GFSI is inviting all interested stakeholders to comment on a proposed new approach to food safety auditors' qualification, training and ongoing Continuing Professional Development (CPD). This approach is underpinned by a proposal that GFSI establish a specific set of GFSI Benchmarking Requirements.
- 2.2. The proposed Benchmarking Requirements were developed by a Technical Working Group gathering experts on the topic representing various GFSI and education stakeholders; this enabled consensus building on the content of the document submitted through this consultation, taking into account different points of view, impact of this work on the GFSI community, and more broadly the food safety community.
- 2.3. The purpose of this consultation is to engage with all interested stakeholders on:
 - the technical content of the proposed Benchmarking Requirements; and
 - the ability of the new approach to deliver the outcomes of the RTTT feature 1.
- 2.4. This consultation is not designed to address any matters relating to the implementation phase of this new approach. This will be addressed in a secondary consultation to enable the focus of this consultation on the above two key topics.
- 2.5. You are invited to respond to this consultation by noon CET on the **25th May 2021**. Please note that any responses received after this deadline may not be considered. You may respond to this consultation by doing BOTH of the following:
 - completing the feedback form published within this consultation's documents with any amendments you may want to suggest to the proposed Benchmarking Requirements, and emailing it to gfsibm@theconsumergoodsforum.com
 - completing our [online survey](#) about the objectives and benefits of the new approach laid in this consultation.
- 2.6. GFSI will be running a free informative webinar on the **19th May at 3pm CET** for any interested parties wishing to ask questions about the content of this consultation document. To join this webinar, you may register on <https://attendee.gotowebinar.com/register/1630058288589722637>.
- 2.7. We would recommend that you read this document fully before proceeding to provide your responses.
- 2.8. This is an open consultation, please feel free to circulate this document to others within your organisation and network who you feel may be interested in responding to it.
- 2.9. Lastly, GFSI would like to thank the members of the Technical Working Group and associated experts for their commitment to their mandate and hard work over the last **12 months**. They made this consultation possible. Particular thanks for their support of this work to:

Jon Poole, Independent Consultant – Chair (Subject Matter Expert)
Susan Ranck, Ranck & Associates LLC – Vice Chair (AB)
Professor Alan Gillies, AGL Consulting (Subject Matter Expert)
Amber Bailey, CanadaGAP (GFSI-recognised Certification Programme Owner)
Andrew Clarke, Loblaw Companies Limited (Retailer)
Anthony Lidong Liang, Eurofins NSC (Certification Body)
Asya Salter, Walmart (Retailer)
Bertrand Emond, Campden BRI (training organisation)

Deepa Thiagarajan, Michigan State University (Academia)
Elizabeth Santos, Maple Leaf Foods (manufacturer)
Guo Wei, New Hope (manufacturer)
Jackie Pelham, GFSI Benchmark Leader (Subject Matter Expert)
Kristie Grzywinski, SQF Institute (GFSI-recognised Certification Programme Owner)
Louise Abayomi, National Resources Institute (NRI), University of Greenwich (academia)
Michelle Tindale, BRCGS (GFSI-recognised Certification Programme Owner)
Peter Wang, ICQ China (consultant)
Stephanie Lemaitre, GFSI Technical Writer
Tania Martinez, Demos Global Group (consultant)

3. Objective of the consultation

- 3.1. In May 2020, GFSI ran a stakeholder consultation on a conceptual framework 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.
- 3.2. The RTTT comprises four initial features. The focus of this consultation is only Feature 1 of the RTTT: to **Develop harmonisation and benchmarking requirements for providers of food safety auditor training and ongoing Continuing Professional Development (CPD)**. This feature intends to address the 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” (see **Appendix 1**).
- 3.3. Guided by the responses to the RTTT consultation from our stakeholders (see https://mygfsi.com/press_releases/8089/), as well as their mandate from GFSI, the Technical Working Group aimed to develop a new training and development regime for food safety auditors which would deliver:
 - A simple, robust professional roadmap for food safety auditors. This roadmap is designed address the challenges faced by the food industry in attracting, developing and retaining food safety auditors by clearly setting out what is required of a competent food safety auditor at each stage of their professional development,
 - An enhanced professional status – creating a distinct professionalisation of food safety auditing as a lifelong career with the aim of boosting entry into the profession and supporting retention,
 - A regime for obtaining and maintaining of a food safety auditor’s license to practise mutualising the efforts invested in auditor’s qualification based on a set of common food safety auditing competencies,
 - A framework that would require food safety auditors to plan and undertake effective Continuing Professional Development (CPD) as part of the maintenance and/or development of their knowledge, skills and behaviours,
 - A consistently high and reliable audit experience for auditees.
- 3.4. **Appendix 2** illustrates in further details how the output of the Technical Working Group addressed the comments received during the April 2020 consultation.
- 3.5. The Technical Working Group determined that the most effective way to deliver against the objectives of the work was to focus on the outputs following the training and development of food safety auditors – that is, to develop a robust and reliable registration

framework (leading to a license to practise) for food safety auditor through a recognised, independent 'Professional Recognition Body' (PRB).

- 3.6. The focus on validation of competence is designed to facilitate access to the profession of food safety auditors through a variety of pathways, from a traditional academic curriculum to an early entry to the professional life complemented with targeted training. It supports the process of "grand-fathering" of well experienced food safety auditors without compromising on their competence and therefore on the quality of the audit.
- 3.7. The proposed GFSI Benchmarking Requirements seek to establish a list of knowledge, skills and behaviours to be assessed by the PRB (called **Annex 1**). The Technical Working Group identified these by referring to
 - the relevant ISO standards,
 - section 4 part II of the current GFSI Benchmarking Requirements applicable to Certification Programme Owners,
 - their own expertise of the topic.
- 3.8. The proposed GFSI Benchmarking Requirements also include a set of expectations on the governance of the PRB to guarantee the integrity and efficacy of their qualification and ongoing monitoring of food safety auditor qualification (**part II**). A primary expectation is that the PRB be accredited to ISO/IEC 17024 (latest version) by a signatory of the International Accreditation Forum's MLA.
- 3.9. The proposed GFSI Benchmarking Requirements aim to ensure ultimately that the PRB not only oversees the food safety auditor's competence against the identified common skills, knowledge and behaviours, but also a process of Continuing Professional Development to support the food safety auditor in maintaining and gaining competence, and ultimately driving their career as a food safety professional.
- 3.10. Taking the learning from the well established GFSI Benchmarking Process for Certification Programme Owners, GFSI also developed a proposed Benchmarking Process for PRB recognition (**part I**), providing assurance in the harmonisation of the PRB's qualification criteria for food safety auditors and their registration of food safety auditors.
- 3.11. The working group concluded that the establishment of a common suite of food safety auditor competencies, robust governance from the PRBs and GFSI's recognition and oversight of the PRBs should result in a new model of mutual recognition of food safety auditor qualification, eliminating the requirements for multiple training and qualification of food safety auditors on the competencies in the scope of the PRB's registration requirements, and therefore cost and time to achieve qualification for the food safety auditor and CBs.

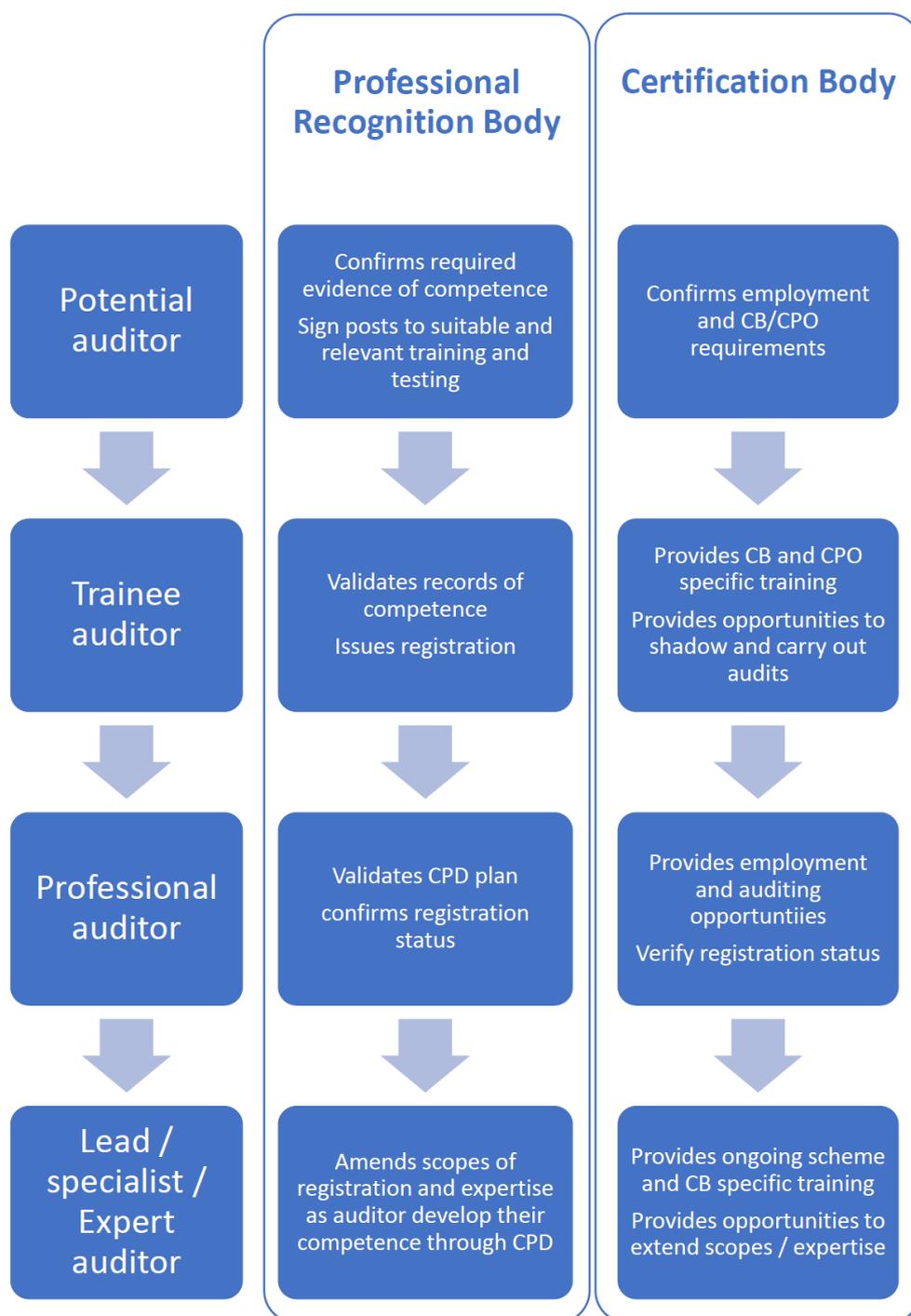


Figure 1: a food safety auditor career

Multi Stakeholder benefits of this proposed new approach

3.12. Whilst this approach requires adding an additional organisation to the current framework, the result will be a simpler approach to food safety auditor’s qualification for all parties, especially for the food safety auditors themselves.

- 3.13. Overall benefits of the approach
- Greater food safety auditor competency and consistency of auditing
 - Less variation in audit experience – more focus on behaviours
 - Competence of food safety auditors having been independently verified
 - Transparency through a publicly visible register – meaning that retailers, governments, auditees can have trust in the scheme – earned recognition
 - Core competencies are scheme agnostic which means less duplication of training, proving competence – leading to reduced costs and time – (currently repeated in programmes)
 - Streamlined qualification requirements to reduce complexity
- 3.14. Specific benefits for food safety auditors
- Development of a distinct profession of food safety auditing
 - Professional recognition = kudos + raise food safety auditor profile and their profession = attracts more food safety auditors
 - Provides, for the first time, a visible and practical career path in food safety auditing
 - Food Safety auditors have ownership of their registration and ongoing development and revalidation
 - PRBs will support food safety auditors' registration through gap assessment and onboarding
 - Broader recognition – benefits new food safety auditors = Leaning on ISO17024 = robust and recognised
- 3.15. Specific benefits to Food Business Operators
- Increased confidence and trust in food safety audit programs
 - Better alignment with the Food Business Operators' expectations
 - Better consistency and transparency
- 3.16. Specific benefits to the CPOs
- Consistency – outcome common target - includes robust governance = gives comfort to CBs + CPOs
 - Mutual CPO recognition of food safety auditor training and qualifications
- 3.17. Specific benefits to Certification Bodies
- Less onerous for CB at the baseline level
 - Easier to recruit
 - Defines a baseline that ensures everyone comes in at the same level
 - Ensures adequate food safety auditor availability for increase in audit demand

4. Implementation

- 4.1. The original implementation timeline announced in April 2020 has been revised to take into account the stakeholder feedback received from the RTTT stakeholder consultation. The following diagram illustrates GFSI's commitment to our stakeholders to deliver this feature.



- 4.2. It would be GFSI’s objective to publish the proposed Benchmarking Requirements in October 2021. This takes into account an extended consultation period including a secondary consultation on the transition to the new proposed approach, and primary and secondary responses to be considered.

5. Next steps

- 5.1. Please respond to this consultation by noon CET on the **25th May 2020**. Please note that any responses received after this deadline may not be considered.
- 5.2. Please complete the “feedback form” appended to the consultation documents detailing any amendments you may want to suggest to the proposed Benchmarking Requirements, and email it to gfsibm@theconsumergoodsforum.com.
- 5.3. In addition, please click [here](#) or scan the below QR code to complete our online survey about the objectives and benefits of the new approach laid in this consultation.



- 5.4. Please click [here](#) to register for our free informative webinar on the **19th May at 3pm**.

Appendix 1 - Stakeholder Consultation - Implementing the GFSI conceptual framework for 'The Race to the Top' (April 2020, extract)

RTTT – Feature 1.

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

3.0. By moving to deliver GFSI Benchmarking Requirements for auditor training and on-going 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 on-going 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 on-going 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.

Appendix 2 - response to the Stakeholder Consultation (published July 2020)

summary of comments	Key topic	Response from GFSI April 2021
<p>“recommended an assessment process to validate training outcome”</p> <p>“Benchmarking should be designed to cover the training organisation and their associated trainers”</p> <p>“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.”</p> <p>“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.”</p> <p>“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.”</p>	<p>The new approach should recognise a variety of training and skill development methods</p>	<p>The Technical Working Group determined that the most effective way to deliver against the objectives of the work was to focus on the outputs following the training and development of food safety auditors – that is, to develop a robust and reliable registration framework (leading to a license to practise) for food safety auditor through a recognised, independent ‘Professional Recognition Body’ (PRB).</p> <p>Section 6 of the proposed Benchmarking Requirements defines requirements on the assessment of competence. It does not prescribe the method to develop the competence, allowing a variety of solutions, from classroom training to apprenticeship.</p>
<p>“and a mechanism for CPOs and CBs to verify the validity of auditor training”</p>	<p>Stakeholders must have a mechanism to provide feedback and verify auditor profile.</p>	<p>The proposed Benchmarking Requirements include publication of the PRB criteria to validate food safety auditor competence, development of those criteria through stakeholder consultation, GFSI recognition through a transparent and consultative process, and</p>

		<p>a mechanism for stakeholders, including CBs and CPOs to provide feedback on registered food safety auditors. It also includes provision to provide access to food safety auditors’ records on request, with the approval of the food safety auditor.</p>
<p>“clarify transition – will this apply to new auditors only, what about already registered auditors?” “The framework should not forget to consider existing auditors and ensure recognition on the new framework to avoid additional burden to existing professionals.” “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.” “Recommendation to take current auditors into account and allow inclusion.”</p>	<p>consideration is required as to the transition of current auditors to the new proposed approach</p>	<p>The original implementation timeline announced in April 2020 has been revised to take into account the feedback received from the RTTT stakeholder consultation. The following diagram illustrates GFSI’s commitment to our stakeholders to deliver this feature.</p> <p>The objective would be to publish the proposed Benchmarking Requirements in October 2021. This takes into account an extended consultation period including a secondary consultation on the transition to the new proposed approach, and primary and secondary responses to be considered.</p>
<p>“Clarification needed as we believe this means a version 2022.” “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.” “The timeline should be reconsidered, otherwise in some countries will be very difficult to get auditors and so, to get certified FBOs.” “Be launched in a timeline that would integrate implementation time for CBs and auditors.”</p>		<p>The original implementation timeline announced in April 2020 has been revised to take into account the feedback received from the RTTT stakeholder consultation. The following diagram illustrates GFSI’s commitment to our stakeholders to deliver this feature.</p> <p>The objective would be to publish the proposed Benchmarking Requirements in October 2021. This takes into account an extended consultation period including a secondary consultation on the transition to the new proposed approach, and primary and secondary responses to be considered.</p>

<p>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.”</p> <p>“recommended a working group including CPOs”</p> <p>“Work with existing training and CPD providers and CBs to define minimum course content, assessment methodology, etc. for food safety auditors.”</p> <p>“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.”</p> <p>“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.”</p> <p>“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.”</p> <p>“Programs GFSI should consider looking at: IAAR Apprenticeship Program partnership with US Dept of Labor, and prior GFSI Auditor Competence Committee work.”</p> <p>“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.”</p> <p>“The IFST has an established process for managing CPD including references for various types of activities which are deemed as actual CPD.”</p>	<p>This new approach and proposed Benchmarking Requirements should be developed in consultation with several parties, including CPOs, currently existing auditor registration and training programmes, CPD providers, CBs, ABs, and academia</p>	<p>GFSI established a multi-stakeholder Technical Working Group who wrote these proposed Benchmarking Requirements. We are also submitted them to this open stakeholder consultation for further scrutiny.</p>
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<p>“Ensure that academy, industry and GFSI Board Members actively collaborate on training content.”</p> <p>“The person certification scheme should be developed in collaboration with the CPO and other interested parties (e.g. Accreditation Bodies IAF members etc).”</p>		
<p>“Recommendation to align training content to currently require lead auditor training based on ISO standards and HACCP training based on Codex guidelines.”</p> <p>“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.”</p> <p>“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.”</p> <p>“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.”</p> <p>“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.”</p> <p>“Be aligned with ISO19011, ISO/TS22003, ISO17021, ISO16065, IRCA rules for FSMS.”</p> <p>“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.”</p>	<p>The proposed Benchmarking Requirements, specifically the auditor competence, should align to existing codex guidelines on HACCP and food hygiene, ISO17011, ISO17021, ISO/TS22003, and sector specific knowledge.</p>	<p>The proposed GFSI Benchmarking Requirements seek to establish a list of knowledge, skills and behaviours to be assessed by the PRB (called Annex 1). The Technical Working Group identified these by referring to</p> <ul style="list-style-type: none"> ■ the relevant ISO standards, ■ section 4 part II of the current GFSI Benchmarking Requirements applicable to Certification Programme Owners, ■ their own expertise of the topic.
<p>“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</p>	<p>The new approach and proposed Benchmarking Requirements must allow harmonisation and mutual recognition of auditor</p>	<p>The working group concluded that the establishment of a common suite of food safety auditor competencies, robust governance from the PRBs and GFSI’s recognition and oversight of the PRBs should result in a new model of mutual recognition of food</p>

<p>qualification and training should provide common rules for CPOs to align their standards and prerequisites.” “Concerned about adding complexity and barriers to entry.” “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.” “Auditors exams performed by some CPOs should be eliminated whenever this feature will be implemented.” “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.” “Current system is onerous and burdensome as it stands.”</p>	<p>competence, and a reduction of duplication of efforts to qualify auditors at CB and CPO level.</p>	<p>safety auditor qualification, eliminating the requirements for multiple training and qualification of food safety auditors on the competencies in the scope of the PRB’s registration requirements, and therefore cost and time to achieve qualification for the food safety auditor and CBs.</p>
<p>“Clarification needed as to who will be the recognised organisations and if it includes scheme-specific training’.” “Clarification needed on how the concept will be developed and managed, e.g. who would be eligible for recognition, potential conflict of interest.”</p>	<p>Clarification is required as to who would be eligible for this new recognition, and how the process would work.</p>	<p>Part I of the proposed Benchmarking Requirements provides that clarification.</p>
<p>“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.”</p>	<p>The new approach needs to be available worldwide.</p>	<p>Done - GFSI has no restrictions around geography in the proposed eligibility criteria, to allow global, regional and national organisations to apply.</p>
<p>“Suggest that GFSI recognize apprenticeship programs and levels of auditor proficiency, recognizing that there is a learning and skill development curve for new auditors.” “Establish a curriculum and career path for colleges and universities (e.g. Wageningen University, MSU, etc.) because we</p>	<p>The new approach should enable a food safety auditor career path.</p>	<p>The proposed GFSI Benchmarking Requirements aim to ensure ultimately that the PRB not only oversees the food safety auditor’s competence against the identified common skills, knowledge and behaviours, but also a process of Continuing Professional</p>

<p>have to start with solving the root cause of the problem in the first place.”</p> <p>“We support this feature. Supportive of the establishment of a curriculum and career path for auditors with university and public training organisations.</p> <p>“Importance of identifying a growth path for auditors entering the profession and not satisfying all criteria yet.”</p> <p>“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.”</p> <p>“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.”</p> <p>“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.”</p> <p>“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.”</p>		<p>Development to support the food safety auditor in maintaining and gaining competence, and ultimately driving their career as a food safety professional. See also figure 1 in the consultation document.</p>
<p>“Issues of antitrust posed in relation to sharing data without permission and between competitors.”</p>	<p>Antitrust</p>	<p>The proposed Benchmarking Requirements and new approach were vetted by GFSI legal counsel and found compliant with antitrust regulation.</p>

		<p>Provision for obtaining permission to share and publish information has been taken in documents.</p>
<p>“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-conformances raised and the audit report.” “This is an excellent approach. 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.”</p>	<p>There is a need for ongoing and regular review of auditor competence, and opportunities for stakeholders to provide feedback.</p>	<p>The proposed GFSI Benchmarking Requirements aim to ensure ultimately that the PRB not only oversees the food safety auditor’s competence against the identified common skills, knowledge and behaviours, but also a process of Continuing Professional Development to support the food safety auditor in maintaining and gaining competence, and ultimately driving their career as a food safety professional</p>
<p>“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.” “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.” “Accredited certification of competence, according to ISO17024, could be a primary step for the recognition of the food safety auditor profession.”</p>	<p>GFSI-recognised providers should be accredited</p>	<p>A primary expectation is that the PRB be accredited to ISO/IEC 17024 (latest version) by a signatory of the International Accreditation Forum’s MLA.</p>

<p>“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”</p>	<p>The new approach should not be too prescriptive.</p>	<p>The GFSI Benchmarking Requirements always focus on the what and intent, they are not prescriptive.</p>
<p>“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.”</p> <p>“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.”</p>	<p>Information about the auditor’s registration should be hosted on an IT platform.</p>	<p>The proposed Benchmarking Requirements include data management and the maintenance of a public register by each recognised PRB</p>