

Responses to 19th May Webinar Questions on Review of RTTT Feature 1



What's wrong with the current situation?

The certification industry at large is facing increasing difficulties in recruiting food safety auditors, with more auditors leaving the profession through retirement than new recruits joining it. This is putting a strain on the Certification Bodies' ability to cater for the increasing demand in food safety audits and represents a severe threat to the whole food safety ecosystem. During the Race to the Top (RTTT) consultation process in 2020, many stakeholders reported to GFSI that the situation had worsened due to ever more complex and duplicated requirements applying to new and existing auditors from GFSI-recognised Certification Programmes. The increasing efforts to become and remain a food safety auditor are becoming demotivating versus the reward of practicing such a critical role.

How is this simplifying the current already cumbersome process of auditor qualification?

Many skills, knowledge and behaviours are core and common to all food safety auditors, including those required by the accreditation criteria ISO17021 and ISO22003, and GFSI Benchmarking Requirements. The new proposed approach offers to establish organisations (Professional Recognition Bodies (PRBs)) responsible for validating those common competencies in a food safety auditor. Potential employers and contractors of those food safety auditors may then rely upon the PRB's registration to verify the auditor is competent, eliminating the need for repeated thorough auditor checks, and allowing focus on CB or CPO specific competence.

Why is GFSI getting involved in this topic?

We recognise our role in and impact on the current complex requirements to become an auditor, and see it as our responsibility to ensure we address this. In short, we want to help. Besides, the steady decrease in the auditor population represents a significant threat to the consistency and quality of audits carried out against GFSI-recognised certification programmes. In time, this could affect the trust food industry members put in GFSI and third-party certification, and we are committed to maintain this trust. We want to work with the relevant actors in the food supply chain to ensure safe food for people everywhere.

Why is GFSI not developing an auditor training programme?

GFSI is a benchmarking organisation set up to provide a reference point for the food industry and harmonise food safety outcomes within a free market. Training is neither our purpose nor amongst our core competencies.

What is CPD, and why focus on it?

Continuing Professional Development or CPD is a way professionals continue to learn and develop throughout their career, so that they keep their skills, knowledge and behaviour up to date, and are able to continue practicing their profession and grow their career. In practice, it may take various forms, such as training, coaching, mentoring, practicing, networking and exchanging with peers, etc. CPD is driven by the individuals themselves, with the support of their employers and PRBs who can sign post individuals to relevant activities and facilitate networking.

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The food industry evolves very rapidly, and with it the food safety risks and best practices. This is why CPD is critical to food safety professionals, and auditors in particular.

CBs, CPOs and food business operators are most impacted by the competence of auditors, how will this ensure their view and feedback is heard?

In the proposal, GFSI set a few requirements to ensure that stakeholders and the PRB share information:

- The PRB is expected to maintain a register of auditors, including a public interface allowing confirmation of an auditor registration at any time (1.31; 1.32)
- The PRB has to have a publicly available complaint procedure, and a whistleblower mechanisms (element 1.20)
- Their registration criteria must be publicly available (1.22)
- Pending agreement with the auditor, the PRB is also obligated to communicate to Certification Bodies any information that may impact the auditor's ability to maintain their registration, including as a minimum action following any disciplinary actions (1.27)

It is worth noting that this will establish more systematic and wider transparency around auditors than currently achieved.

Who could apply to become a GFSI-recognised PRB and are there such organisations out there today?

The GFSI eligibility criteria are defined in the proposed Benchmarking Requirements. In summary, any organisations dedicated to the development and validation of professional competence may apply as long as they satisfy the GFSI Benchmarking Requirements. Such organisations exist in various sectors, including quality management and food (IRCA, ASQ), accounting (AICPA). We also hope that current organisations with training or development programmes who may not have a focus on validation of competence will see the opportunity this new approach represents and will join us.

Can CBs apply?

The current criteria do not prevent CBs from applying to become GFSI-recognised PRBs, but they have to demonstrate their independence from the work they do on delivering certification to food safety programmes. We invite stakeholders to review the wording of the eligibility criteria in part I of the consultation and suggest improvements GFSI could make to make it clear that no organisations are excluded if they meet the eligibility criteria. In the case of CBs, the criteria will mean demonstrating that they have suitable measures in place to separate their certification activities from the role they play as a PRB.

So, what's the role of CBs and CPOs in this new approach?

The CBs continue to provide employment / missions to the food safety auditors and therefore to satisfy themselves an auditor is suitably qualified to carry out their role. This new approach aims to simplify this task for them, not eliminate it. Besides, validation of competence includes activities that only CBs can enable, such as shadowing and observing audits, giving feedback on the auditor's performance on the ground.

CBs and CPOs will also continue to define competence specific to their operations and programme, as the new approach solely focuses on common competence.

Will this become a GFSI requirement for GFSI-recognised Certification Programme Owners?

This was part of our framework commitment published in the Race to the Top consultation, and we will consult on this specific matter and on how to implement this new approach taking into account the impact on all affected stakeholders. However, our primary focus is to come up with a robust model that inspires trust from these stakeholders.

The benefits mentioned in the consultation seem to target freelance auditors, what benefits does this new approach bring to fully employed auditors?

We believe this feature will benefit all auditors. Membership of a professional development organisation allows professionals to take responsibility and make choices for their professional development and career advancement. The aim is that food safety auditors will be enabled to do so with this new approach, beyond the nature of their employment relationship with CBs.

Following the analogy of learning to drive, the largest element is the actual driving or practical elements, not the examination documents – so would the PRB be required to witness/observe auditors during audits?

GFSI is responsible for the ‘what’ and not the how of food safety. Akin to the role we play in benchmarking and harmonising certification programmes, GFSI does not prescribe how auditor competence may be validated. This is for the PRB to define.

Can auditors, who passed the GFSI auditor-exam in the past, enjoy any advantage when they are assessed by PRB?

It is for the PRP to decide in its validation of auditor competence what accreditation of prior learning it will consider.

Have you confirmed that the IAF ABs will accept the qualification of a PRB, or will they continue to require CBs to complete the same work again?

GFSI has of course been in dialogue and consultation with IAF members.

When a CPO is involved, the AB will require that the CB applies the requirements of the CPO. Many of the redundant CPOs' rules on auditor qualification come from GFSI requirements currently applying to CPOs. GFSI is in a strong position though thanks to the work of the Working Group on the new proposed approach, who ensured that all current GFSI requirements applying to CPOs as regards to auditor qualification are included in the new proposed requirements applying to PRB, enabling us to explore a simplification of current CPO requirements as part of the transition consultation

Are you thinking to recognise only one PRB in the world? If more than one, how are PRBs going to be approached to each other or auditors?

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We will recognise as many PRBs as we receive successful applications from and have no targets or expectations as to how many PRBs will be recognised. GFSI's approach focuses on harmonisation of outcomes whilst leaving the market to dictate the demand and as such how many recognised entities are necessary to cater for the entire food safety auditor community globally.

What about additional cost by introducing this new recognition programme for auditors on top of existing certification programmes? Who has to pay for that, is it certification bodies or auditors?

It will be a matter for the PRB to define their business and financing model; GFSI has no role to play in this.

Can you comment on the potential challenges of the proposed system for on-farm auditors? It can be difficult to get trained auditors who are also familiar with specific agricultural practices and working with farmers. Requiring professional recognition may be an obstacle to getting new on-farm auditors?

GFSI sees this feature as an opportunity to deal with challenges such as this, as the requirements are set to allow a multi entry system, acknowledging competence acquired in various ways, including significant on-the-job experience. This is extremely relevant in the primary production sector.

Are there costs involved in GFSI recognition process?

There are administrative costs associated with GFSI benchmarking activities; those are not set yet for this new approach, but they will be published in full transparently on a cost recovery basis only alongside the final requirements and the application form.

You can find current cost of benchmarking for CPOs in the current application form as an indication.

What is the process for applying to GFSI to become a Professional Recognition Body?

An application form will be published with the final benchmarking requirements in October 2021. An applicant will only need to complete this form and email back to us at GFSI.

What is the timeline for publishing the final competency documents and posting the PRB application?

Timelines are detailed in the consultation document and our aim is to publish the final documents in October 2021.