

GFSI Response to the Stakeholder Consultation on Feature 1 of the Race to the Top

August 2021



Key Changes and Points of Clarification to the Documents

Each respondent received individual answers to their comments. Below is a summary of key amendments made to strengthen the document based on the consultation responses.

Part	Topic	Main comments	Key amendments to the draft GFSI Requirements
II – Requirements on the governance of the Professional Recognition Body (PRB)	Coexistence with ISO17024 accreditation requirements	<p>A few comments challenged the requirement for ISO17024 accreditation of the PRB</p> <p>A few other comments highlighted the redundancies between the draft GFSI Benchmarking Requirements and the ISO17024 requirements.</p>	After review, GFSI decided to maintain the requirement for PRB accreditation to ISO17024. In the draft GFSI Requirements, any key elements repeating ISO requirements were removed. The GFSI Requirements were also reviewed to ensure full coherence with the requirements of ISO17024
I – Benchmarking Process	Eligibility criteria - The Professional Recognition Body shall be accredited against ISO/ IEC 17024 by an Accreditation Body (AB) member of the International Accreditation Forum (IAF) and signatory to the Multilateral Recognition Arrangement (MLA)	A few comments challenged the availability of ABs signatories to the IAF MLA for ISO/IEC 17024 globally	a few ABs have ISO/IEC 17024 already included in the scope of their MLA arrangements with the IAF, including several who operates on a global level. We also expect that this feature will create a need that ABs will see value in addressing, and adding this ISO standard to their scopes of IAF MLA
I – Benchmarking Process	Eligibility criteria – The Professional Recognition Body can demonstrate impartiality from any food safety certification, conformity assessment, training and / or Certification Programme Owner activities,	A few comments challenged this eligibility criterion seemingly excluding CPOs and CBs working with GFSI-recognised CPOs. This contradicted an original commitment made during previous consultations on this project	The criterion was modified, the eligibility criterion now requires “impartiality” (rather than independence) from activities associated with GFSI-recognised Certification Programmes
I – Benchmarking Process	Eligibility criteria - The Professional Recognition Body can demonstrate experience in establishing and running a successful Professional Recognition	A few comments mentioned that expecting the submitted programme to have registrants at the time of application may be causing issues as we all transition to the new approach	The criterion was modified to measure more broadly the competence of the PRB to run a professional recognition programme.

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	Programme for at least 100 registrants (but not necessarily dedicated to auditors or food safety),		
I – Benchmarking Process	Eligibility criteria – The Professional Recognition Body is not governed or owned by a public or governmental entity	There was a challenge to this criterion which eliminates some universities and educational organisations	This criterion was removed
I – Benchmarking Process	Process - The Professional Recognition Body has completed the GFSI self-assessment form to validate that it is in alignment with the GFSI Benchmarking Requirements		The Benchmarking Process was changed so that self-assessment forms will be available publicly and expected to be completed as part of the application process, rather than in the desktop review step of the process. This ensures a more robust self-assessment of the PRB, and a speedier process once the application is accepted.
I – Benchmarking Process	<p>Process – Content of the Random Record Reviews</p> <p>The Benchmark Leader remotely selects registered auditors at random and sends the Professional Recognition Body a list of objective evidence and files related to these auditors required to verify alignment to the GFSI Benchmarking Requirements.</p> <p>The number of samples is at least the square root of the total number of auditors registered with the GFSI-recognised Professional Recognition Programme. The Benchmark Leader may increase this number if authenticated complaints (see complaint investigation) or results of previous assessments raise concerns over the continued alignment of the Professional Recognition Programme to the GFSI Benchmarking Requirements.</p>	Several comments questioned the validity of a set number of samples for this step of the monitoring of continued alignment, as it takes into account neither the size of the PRB nor any results of previous assessments, complaints or incidents.	The process was changed, the sample size is calculated as the square root of registered auditors and may be adjusted by the Benchmark Leader.

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I – Benchmarking Process	Application options	There were a few comments that this section was confusing, and the differences between “full benchmarking” and “continued recognition” were not clear	This section was re-written, and a chart was added to sum up and illustrate the different application options.
I – Benchmarking Process	Content of the Random Record Reviews The Benchmark Leader remotely selects registered auditors at random and sends the Professional Recognition Body a list of objective evidence and files related to these auditors required to verify alignment to the GFSI Benchmarking Requirements.	There were a few comments that five auditors, the original size set for the sample, was arbitrary and not necessarily representative of the PRB’s size, risk, or complexity of operation.	The sampling methodology was changed: “The number of samples is at least the square root of the total number of auditors registered with the GFSI-recognised Professional Recognition Programme.”
II - Requirements on the governance of the PRB	Annex 1		Annex 1 was converted into a Part III of the Benchmarking Requirements
II - Requirements on the governance of the PRB	References to CPO requirements on auditor qualification	Many comments challenged the overlap between the PRB Competence requirements and the CPO current Requirements on auditor qualification	The Requirements were reviewed to ensure that the principle of the PRB covering the common food safety auditor competence, and the CPOs retaining decisions on auditor competence specifically related to their certification programme.
II - Requirements on the governance of the PRB	Opportunity to feedback on auditors and professional recognition programmes, to the PRB	Many comments asked for assurance that the PRB would take into account feedback from stakeholders on their recognition programmes, and the competence of their registered auditors, specifically from CPOs and CBs.	Several elements of the GFSI Requirements ensure mechanisms will be in place to enable such feedback is received and acted upon: <ul style="list-style-type: none"> ● stakeholder review of professional recognition programme during its development ● access to auditor records by CBs (with the authorisation of the auditor)

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			<ul style="list-style-type: none"> • communication with the CBs on any information that may impact an auditor’s registration, facilitated by a declaration and agreement from the auditor that the PRB may contact the CBs they work with • requirement for a formal complaint procedure by ISO/IEC17024 • the GFSI complaint procedure (Part I) also allows dissatisfied parties to raise their concerns directly to GFSI for investigation
II - Requirements on the governance of the PRB	The protection of personal data	A few comments raised concerns about the maintenance of a public register, including GDPR within the EU.	<p>The GFSI Requirements minimise the information to be available on the register to provide confirmation that an auditor is truly registered.</p> <p>Several Requirements make specific mention of data sharing, storing and handling within the applicable regulatory framework, including GDPR within the EU, and with the agreement from the auditor.</p>
III - Requirements for the competence criteria of the professional recognition programme	Pre-requisites – higher education	Several comments asked about a clearer definition of this requirement on the educational level of candidates, or equivalent competence.	A definition of “higher education” was added to the glossary to account for the regional language used for that target level of education
iii - Requirements for the competence criteria of the professional recognition programme	Pre-requisites – The pre-requisites shall include assessed criteria confirming knowledge and skills equivalent to a “higher level” HACCP training programme (including knowledge assessment by an examination and skill practices by means of application) based on Codex Alimentarius accepted	Several comments asked about a clearer definition of this pre-requisite on the competence of the candidate in HACCP	The pre-requisite was reviewed to be clearer and emphasise the importance of a robust knowledge assessment.

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	by the Professional Recognition Body (based on criteria defined in Part II, section 6).		
iii - Requirements for the competence criteria of the professional recognition programme	2.2.3 Identification of food safety culture practices and approaches	A few people commented that food safety culture was not prominent enough in the required competence to verify.	This element around food safety culture was added to the required competence of a candidate
III - Requirements for the competence criteria of the professional recognition programme	General – language	Several comments asked clarification on competence in annex I / Part III referring to “audited site”.	Any reference to the audited site was removed and replaced with “the scope of registration of the auditor”

