GFSI PUBLIC-PRIVATE PARTNERSHIP

GFSI Position Paper on WHO Global Food Safety Strategy 2022-2030

Introduction

The Global Food Safety Initiative (GFSI) is the longest established coalition of The Consumer Goods Forum, a pre-competitive CEO-led non-for-profit organisation, that brings consumer goods retailers and manufacturers together globally. Through this coalition it helps the world's retailers and consumer goods manufacturers to collaborate, alongside other key stakeholders, to secure consumer trust and drive positive change, including greater efficiency. With its global reach via a local and global network, CEO leadership and focus on retailer-manufacturer collaboration, CGF drives positive change and helps address key challenges impacting the industry, including environmental and social sustainability, health, food safety and product data accuracy by ensuring better lives through better business. Driven by the most stringent governance rules on anti-trust and ethics based on transparency, trust, formal engagement, and collective action based on impact, CGF and its food safety coalition GFSI engages with public organisations via formal collaboration framework to ensure transparency and accountability throughout the duration of the partnership.

GFSI, a coalition of action of the CGF is the world's largest collaboration on food safety by food safety professionals with a vision of *safe food for people everywhere*. GFSI advances food safety initiatives through its strategic objectives such as benchmarking and harmonisation, with GFSI's benchmarking process now the most-widely recognised food safety verification initiative in the food industry worldwide.

The GFSI Benchmarking Requirements[1] are built through the consensus of experts and are based on internationally recognised standards such as Codex Alimentarius. These standards form a widely accepted understanding of what constitutes a robust food safety certification programme. Additionally, GFSI takes proactive measures in establishing new criteria based on scientific evidence and stakeholder expertise, hence the GFSI observer's seat at CODEX. The benchmarking requirements' criteria help to ensure that the programmes continue to deliver on GFSI's vision, often ahead of discussions that may be happening within a national food control system (NFCS).

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[1] https://mygfsi.com/wp-content/uploads/2019/08/GFSI-Benchmarking-and-Recognition.pdf

The GFSI Benchmarking Requirements are intended to transcend borders and build food safety into all aspects of a company, from management commitment to processes and procedures. Food business operators (FBOs) across the globe have demonstrated their commitment to *safe food for people everywhere* by undertaking voluntary accredited third-party certification in a GFSI recognised programme, often with a significant investment in resources. Food business operators who are certified may represent a diminished risk in the food landscape since regimented rules and procedures are in place to grant the certification and to maintain ongoing certification, including onsite audits.

GFSI believes that national food control systems are the foundation in support of consumer safety. Therefore, GFSI intends to play only a complementary role as a benchmarking organisation with its recognised accredited third-party certification programmes to be used as a risk-based indicator for national food control systems to have more informed and risk-based resource allocation of their inspection activities in the context of good regulatory practices. This is the overall strategic outcome sought by GFSI for one of its three strategic priorities (on public-private partnerships). GFSI recognised accredited certification programmes can – and should be considered – as an effective tool in assisting relevant regulatory authorities in meeting their NFCS objectives: knowledge regarding a food business operator's certification status and scope can be valuable input in helping to decide where regulatory resources should be spent.

Strengthening Efforts on Food Safety

The 73rd World Health Assembly passed resolution 73.5 on Strengthening Efforts on Food Safety, acknowledging the significant burden of foodborne disease, and the critical role that food safety plays in the achievement of many of the Sustainable Development Goals, the contribution to the WHO's Thirteenth General Programme of Work 2019-2023, and efforts to address universal health coverage.

The resolution requested that the WHO global strategy for food safety (2002) be updated to address current and emerging challenges, incorporate new technologies and include innovative strategies for strengthening food safety systems. WHO published its draft new global food safety strategy for 2022-2030 for public consultation in June 2021 and has requested that GFSI bring its perspective on the strategy. GFSI has consulted its membership and has adopted the position contained herein.

1. **GFSI and its members wish to reiterate their support for the resolution on strengthening efforts on food safety and the collective action 'One Health' approach.**

Resolution 73.5 further recognised the need for collective action and a "One Health" approach at all stages of the supply chain, while reiterating that food business operators (FBOs) have the role of, and responsibility for, ensuring the safety of their food products.

Acknowledging the significant burden of foodborne disease, and the critical role that food safety plays in the achievement of many of the Sustainable Development Goals, GFSI is supportive of the WHO efforts to establish a new strategic framework for 2022-2030.

As our food network becomes more globalised and interconnected, we have seen a shift towards greater transparency and integrity as consumers are awakened to issues of food safety and traceability. With this has come a recognition that we cannot build a safer and more efficient food supply chain without the support of local and international public partners. Utilising our collective resources, industry stakeholders and governments can work more effectively together to ensure that there are safeguards in place along the entire value chain, from origination to the end consumer. With this understanding that no one achieve this alone, GFSI has made it a priority to foster public-private partnerships (PPPs) between private companies, government food safety regulators, and intergovernmental organisations (IGOs) in order to harmonise global food safety regulations and reduce barriers to trade. By stimulating dialogue and joint programmes between public and private sectors, GFSI is working to advance food safety worldwide while building consumer trust and increasing industry efficiency. One of GFSI three strategic outcomes is to strengthen public-private partnerships so that food safety regulators trust that GFSI-recognised certification can be used for risk-based resource allocation. GFSI welcomes the opportunity to collaborate with WHO and every other stakeholder to collectively address the *safe food imperatives*[2].

2. *An exceptional momentum accompanied by a pragmatic vision is necessary to accelerate food safety efforts.*

The World Health Organisation estimates that almost one in ten of the world's population suffers from a foodborne illness annually, and that issues of food safety disproportionately affect the most vulnerable of society, destabilise communities and hurt economies.

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[2] The Safe Food Imperative: Accelerating Progress in Low- and Middle-Income Countries, World Bank

Only when food is safe will it meet the nutritional needs to address food security and help ensure that everyone can live a healthy life.

Greater attention to food safety is to be applauded, and the WHO occupies a unique position to bring together all stakeholders behind a common cause. It is in this context that GFSI is keen to support the development and implementation of a renewed food safety strategy. The WHO draft strategy sets a reasonable, accurate context but misses the opportunity to clearly state that we are at a tipping point in our approach to achieving safe food. This tipping point has been created by the risks associated with climate disruption and the availability of new technologies such as genomics, big data, and a broad shift to risk-based legislation. As responsible stakeholders of food safety systems in supply chains, we would argue that the WHO strategy does not reflect this sense of urgency and pragmatic imperative. Rather it proposes a relatively academic, distanced review and does not provide the momentum and tools to empower all necessary stakeholders (regulators, consumers and businesses), to provide concrete solutions to those imminent challenges. GFSI wishes to bring this perspective from industry to the strategy by providing concrete solutions as well as bringing some operational solutions to WHO in the implementation plan of the strategy that will be developed by WHO in the autumn of 2021. GFSI will therefore publish on its website by the end of November 2021 a proposal that will be shared with WHO about its perspective on how the private sector, via the use of GFSI tools, can take a pivotal role in supporting the implementation of the WHO food safety strategy and operate as an implementing partner for 2022-2030.

3. The necessary acceleration requires an unprecedented inclusive approach to collaboration between the public and the private sectors.

The private sector calls for further inclusiveness from WHO in this strategy for businesses

GFSI is disappointed to witness the lack of inclusivity towards key delivering stakeholders of safe food, the food business operators and the private sector working in supply chains every day for safer food. CODEX has recognised the responsibility of FBOs to produce safe food since 2013 via The General Principles of Food Hygiene: Good Hygiene Practices (GHPs) and the Hazard Analysis and Critical Control Point (HACCP) System. The global strategy on food safety does not reflect the responsibility owned by FBOs and the efforts that should be carried out in order to ease understanding and collaboration between regulators and FBOs, to empower FBOs to be fully aware about regulatory frameworks so as to facilitate their fundamental role in producing safe food in compliance with the regulatory frameworks in which they operate.

The WHO Technical Advisory Group (TAG) on Food Safety which has been involved in developing the draft food safety strategy for 2022-2030 is heavily skewed towards national regulators, while members from the

private sector are absent. Besides the lack of transparency on how the members were selected, there is no transparency on the consideration given to attain an adequate distribution of technical expertise, geographical representation and gender balance, and there is a distinct absence of private sector inclusion[3]. This results in a paucity on the TAG of anyone who has worked in food production or retail. Furthermore, there was an absence of consultation with the private sector in the development of the draft strategy, which undermines strategic priority number four ("Strengthen Stakeholder Engagement and Risk Communication").

The draft strategy follows four principles: forward-looking, evidence-based, people-centred, and cost-effective. Business has an essential role in all four areas as the resolution makes clear, but there is no attempt in the draft strategy to define a role for that partnership or mechanism for inclusion. In the paragraph describing the people centred principle, the WHO fails to mention any references to the private sector, only mentioning *Successfully ensuring food safety from farm to fork requires a more inclusive approach with all stakeholders, including empowered consumers*[4]. GFSI believes that no global food safety strategy can be achieved effectively without empowering food business operators by supporting the development of capacities to have informed FBOs on regulatory compliance, understanding their responsibilities in endorsing and implementing food safety culture to produce safe food for people everywhere.

Applying the 'One Health' approach to food safety requires collaboration

The 73.5 resolution on Strengthening Efforts on Food Safety urges Member States to apply a "One Health" approach that promotes the sustainability and availability of safe, sufficient, and nutritious food for all populations while recognising the interconnection between food safety and human, animal, plant and environmental health, including foodborne antimicrobial resistance and climate change. For a "One Health" approach to work, all sectors of society need to collaborate while seeking sustainable and sufficient agriculture production to feed the world. GFSI supports this approach and reminds the WHO of the importance of FBOs to its implementation.

The enormity of the challenge requires coordination with clear strategic trajectories and roles for UN agencies towards external stakeholders

Through long standing collaboration and complementary mandates, FAO and WHO work to support global food safety and protect consumer health. The two organisations have joint programmes on food standards

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[3] WHO Technical Advisory Group on Food Safety: https://www.who.int/groups/technical-advisory-group-on-food-safety-safer-food-for-better-health/members
[4] Line 343 – 345 to 800 of the draft WHO global strategy for food safety 2022-2030 as of June 30

3rd November 2021

(Codex Alimentarius), the provision of scientific advice (JECFA, JEMRA, JMPR, JEMNU) and emergency response (INFOSAN). The 73.5 resolution on Strengthening Efforts on Food Safety encourages the two organisations to further coordinate their strategic efforts on food safety and support for Codex.

In several places in the draft strategy, the WHO references the FAO, but fails to specify the role that each organisation would play relative to the other. If this strategy is to be truly complementary to the efforts of the FAO, their respective roles need to be clearly articulated. This clarification would assist other key implementing partners, such as the private sector, to formulate plans and understand how they can further assist both organisations in the implementation plan of their respective food safety strategies.

4. **There is a need to fully support the use of all available food safety management tools for food business operators and to overcome the myths around accredited third-party certification.**

Debunking the myths around third-party certification

Resolution 73.5 urges Member States to promote the use of food safety management tools among food business operators at all levels, including small-scale producers, and to encourage private sector investment in safe and sustainable production and supply chains. In response to this call, strategic objective 4.4. of the draft strategy, encourages national food safety systems to facilitate communication and engagement with food business operators and foster a food safety culture; however the document in the *Strategic objective 4.2: The use of non-regulatory schemes for enhancing food safety across the food chain*[5] also inaccurately downgrades the benefits of the use of voluntary third-party assurance programmes while simultaneously diminishing the work done via CODEX CCFICS with the *Principles and guidelines on the assessment and use of voluntary third-party assurance programmes*[6].

The *Strategic objective 4.2: The use of non-regulatory schemes for enhancing food safety across the food chain* states that *private food safety standards may conflict with national regulatory food control systems that already incorporate agreed levels of consumer protection. Furthermore, they may present challenges for less developed countries that are already meeting Codex international standards and create an uneven playing field for different suppliers in common food systems. It is important that private food safety standards do not compete with – and marginalize – national authorities in exporting countries.* GFSI believes that the immensity of the challenges linked to food safety

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[5] Line 781 to 800 of the draft WHO global strategy for food safety 2022-2030 as of June 30

[6] CCFICS vTPA *Principles and guidelines on the assessment and use of voluntary third-party assurance programmes* approved at step 8 and for final at for CAC 44 in November 2021

3rd November 2021

and food systems requires the support and collaboration from all. The coalition of the willing that GFSI represents with its mission of *safe food for people everywhere* should not be diminished by outdated and incorrect assumptions around the use of voluntary third-party assurance programmes and thus wishes to debunk each of those myths.

A complementary role for GFSI in the global food safety systems governance

GFSI's voluntary third-party assurance programmes (vTPA) are designed to support food business operators with a total view of food safety and serve as a complementary programme to a country's National Food Control System. As such, the programs are not intended to mirror any country's food laws but are intended to serve as the cornerstone for effective food safety and quality management systems. GFSI believes that national food control systems are the foundation in support of consumer safety.

GFSI's benchmarking requirements are built through the consensus of experts and are based on internationally recognised standards such as Codex Alimentarius. These standards form a widely accepted understanding of what constitutes a robust food safety certification program based on the work of food safety experts gathering in GFSI technical working groups (food safety professionals from the industry, regulators, academics, certification bodies, certification programme owners…) since more than 20 years. GFSI believes it can play a <u>complementary</u> role as a benchmarking organisation with its recognised accredited third-party certification programmes to be used as a risk-based indicator for national food control systems to have more informed and risk-based resource allocation of their inspections activities in the context of good regulatory practices. GFSI-recognised accredited certification programmes can – and should – be considered as an effective tool in assisting relevant regulatory authorities in meeting their NFCS objectives: knowledge regarding a food business operator's certification status and scope can be valuable input in helping to decide where regulatory resources should be spent. GFSI and its members believe in robust national food control systems and regulatory oversight. The first criteria requirements for each FBO audited against one of the GFSI-recognised CPOs is to be compliant with the applying regulatory framework in which the FBO operates. The benchmarking requirements are intended to transcend borders and build food safety into all aspects of a company, from management commitment to processes and procedures with concrete tools that can be evidenced during an audit while reducing the audit burden and duplication in a supplier. They are not intended to duplicate national, regional, or international regulatory control systems and standards nor to replace any regulatory oversight.

Food business operators certified against a GFSI-recognised CPO represent a diminished risk in the food landscape since regimented rules and procedures are in place to grant the certification and to maintain ongoing certification, including onsite audits. Those efforts should not be diminished nor disincentivised in the WHO strategy as FBOs using voluntary accredited third-party certification are the first supporters of safer food for their customers and people everywhere. Food business operators across the globe have demonstrated their commitment to food safety by undertaking voluntary accredited third-party certification in a GFSI-recognised programme, always with a significant investment in resources (personnel expertise, processes, machines and so forth).

Accredited third-party certification serves food business operators as a mechanism and framework with tools to improve their food safety management systems by creating a food safety culture

GFSI has been one of the first global organisations to issue guidelines[7] for the food industry to develop a food fraud mitigation plan[8] in its food safety management systems, which it did in 2014 by including a mandatory requirement for a food business operator to develop a food fraud plan in order to succeed to a food safety audit led by a GFSI-recognised certification programme owner. These additional requirements that have been included in the GFSI Benchmarking Requirements stipulate that a food business operator must perform a food fraud vulnerability assessment and have a food fraud vulnerability control plan in place to mitigate the identified vulnerabilities. Consequently, since 2014, each FBOs succeeding on a food safety audit from one of the twelve GFSI-recognised certification programme owners, has put in place a food fraud mitigation plan with 871,491 certificates delivered since the implementation of the food fraud position in 2014.

Food safety culture

With increased food safety challenges and current trends in contamination-related issues, FBOs are left with no option but to continuously seek and implement new techniques and strategies to ensure the manufacturing and distribution of safe food. In the latest version of the GFSI Benchmarking Requirements, Version 2020, GFSI has integrated a food safety culture approach by requesting that audits performed by a GFSI-recognised CPO provide evidence of the senior management's commitment to establish, implement, maintain, and continuously improve the Food Safety Management System. This includes elements of food

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[7] https://mygfsi.com/press_releases/gfsi-position-paper-on-mitigating-the-public-health-risk-of-food-fraud/

[8] In line with the GFSI's mission statement in 2014, GFSI declared that the additional requirements and food fraud definition ensure a focus on food safety, rather than other factors such as commercial gain. The requirements specify that companies must perform a food fraud vulnerability assessment and to have a food fraud vulnerability control plan in place to mitigate the identified vulnerabilities. The GFSI Board at that time stated that it *believes that the mitigation of food fraud is an integral part of a company's food safety management system.*

safety culture, consisting of communication, training, feedback from employees and performance measurement on food safety related activities at a minimum. The deployment of Version 2020 of the GFSI Benchmarking Requirements has encouraged FBOs to engage, maintain and consolidate a food safety culture with better informed food safety management systems.

The need to focus on building capacities to create an environment favourable to the development of food safety culture

WHO mentions in *Strategic objective 4.2: The use of non-regulatory schemes for enhancing food safety across the food chain[9] Furthermore, they may present challenges for less developed countries that are already meeting Codex international standards and create an uneven playing field for different suppliers in common food systems. It is important that private food safety standards do not compete with – and marginalize – national authorities in exporting countries.* GFSI again notes a missed opportunity to engage industry. In many cases businesses have years of practical experience in capacity building within their supply chains and beyond that could be valuable to strengthen this part of the global food safety strategy. GFSI also rejects the argument that *the use of non-regulatory schemes* (…) *presents challenges for less developed countries that are already meeting Codex International standards and create an uneven playing level field for different suppliers in common food systems*. GFSI has worked to achieve its goals on capability building, one of its three strategic objectives, through the development of its Global Markets Programme (GMaP). This paragraph in the WHO's global strategy for food safety demonstrates a lack of understanding of the role of accredited third-party certification. GFSI has created capability building tools to provide a pathway towards GFSI-recognised certification for companies with less sophisticated food safety systems. This set of guidance and implementation tools sets out how companies who want to improve their food safety systems can meet the challenge of food safety while improving market access by focusing on the basics of food safety, especially by providing food safety management system tools for less sophisticated FBOs to have an understanding of Codex international standards in an operational way. GFSI's Global Markets Programme is an inclusive and open-source programme developed by industry experts. It provides an unaccredited entry point for companies with its step-by-step programme designed to build capacity within primary production and manufacturing operations while implementing a course of continuous improvement.

Developed in 2008, the Programme was designed to support small or less developed FBOs in achieving certification to a GFSI-recognised food safety programme and to improve market access. The aim was to help

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[9] Line 781 to 800 of the draft WHO global strategy for food safety 2022-2030 as of June 30

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.

It is a voluntary programme, with a toolkit containing 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 was never intended to be a fully stand-alone programme, which could unintentionally devalue full certification. The end destination has always been full certification after a three-year process. Over 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. Despite GFSI's success in driving improvements in food safety capabilities through the GMaP, there is no room for complacency. In September 2020 GFSI launched a strategic review of the GMaP.

In 2020, GFSI launched a radical suite of initiatives designed to improve trust and confidence in the GFSI brand. This conceptual framework is called 'The Race to the Top' (RTTT). 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. Four fundamental features of the RTTT framework were shaped with the support of stake-holders, comprising representatives from Accreditation Bodies, Certification Bodies, Certification Programme Owners, CGF members and the broader industry who provided significant inputs between the October 2019 and February 2020 GFSI Board Meetings. This framework was shared for formal stakeholder consultation in the spring of 2020. 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. 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. In September 2020, GFSI 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,
- and best practice examples where use of the GMaP toolkit has achieved its intended outcomes and any recommendations as to how we replicate this.

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

This consultation provided the GFSI community with an enhanced food safety capability building agenda and has enabled us to support tangible improvements in food safety management expertise regardless of the size and scale of the company, or whether they are operating in a domestic or global supply chain. GFSI deplores the lack of participation from WHO to this public consultation.

GFSI has aggregated the outcomes from the RTTT consultation as they relate to the GMaP into six themes around which we believed we needed 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.*

The original outcomes GFSI was seeking to achieve through the GMaP were to improve the food safety management systems of FBOs 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, informal markets, and humanitarian aid. In these initiatives, certification would not necessarily be the end goal. The overall intent is for GFSI's food safety

capability building ambitions to encompass all settings where safe food for consumers is at risk. Considering all of the feedback GFSI has received, GFSI has made it an absolute priority to restructure and reshape a new capability building approach based on food safety challenges and opportunities that have arisen in the past 10 years to significantly extend its reach in all markets. GFSI is working with the Steering Committee on drafting its new approach fully data driven and digitally based and invites the WHO to further explore with GFSI and its members the potential for businesses, alongside IGOs and regulators, to collaborate within GFSI's new capacity building approach by contributing to the implementation of the global strategy for food safety strategic objectives 2 (*Identifying and responding to food safety challenges resulting from global changes and transformations in food systems*), 3 (*Increasing the use of food chain information, scientific evidence, and risk assessment in making risk management decisions*)., 4 (*Strategic priority 4: Strengthening stakeholder engagement and risk communication*), 5 (*Strategic priority 5: Promoting food safety as an essential component in domestic and international food trade*).GFSI believes its new capability building approach could support all the following strategic objectives of the WHO global strategy on food safety:

- *Strategic objective 2.2: Adapt risk management options to emerging foodborne risks brought about by transformation and changes in global food systems and movement of food*
- *Strategic objective 3.1: Promote the use of scientific evidence and risk assessment when establishing and reviewing food control measures.*
- *Strategic objective 3.2: Gather comprehensive information along and beyond food chain and utilize these data when making informed risk management decisions*
- *3.3: Source food safety information and risk analysis experiences from beyond national borders to strengthen risk management decisions and technical capacity,*
- *Strategic objective 4.4: Facilitate communication and engagement with food business operators and foster a food safety culture.*
- *Strategic objective 5.1: Strengthen food controls and capacity development in regulatory systems for the domestic market.*
- *Strategic objective 5.2: Strengthen interaction between national agencies responsible for food safety and those facilitating the food trade.*
- *Strategic objective 5.4: Strengthen engagements of national competent authorities with international agencies and networks that establish standards and guidelines for food in trade.*

Food Business Operators are often better positioned than governments to engage their peers in a discussion on food safety culture, and to provide them with the tools to undertake a self-assessment to identify where further capacity building efforts are needed. GFSI invites WHO to engage a partnership to strengthen

3rd November 2021

understanding and collaboration to develop capacities to the food safety challenges resulting from food systems shifts and challenges by using GFSI new capability building framework as a vehicle to develop capabilities and capacities in the private sector to answer those challenges.

Conclusion

GFSI welcomes the World Health Assembly's resolution 73.5 entitled: "Strengthening efforts on food safety". The current draft (June 30, 2021) of the WHO Global Strategy for Food Safety 2022-2030, is a much-needed initiative that cannot hope to succeed without involving those who impact the food supply most – businesses.

GFSI has noted a number of concerns with the draft strategy and since July 2021 has engaged in a discussion with WHO on how to formalise this collaboration. GFSI is ready to work with WHO as an implementing partner to address these concerns. GFSI stands ready to deliver a measurable impact for the advancement of the WHO's strategic outcomes as outlined in the draft strategy. The use of non-regulatory approaches, including voluntary third-party assurance programmes, capacity building and the development of food safety culture are key mechanisms that will complement strengthened risk-based government oversight.